

No. 22-16826

In the
UNITED STATES COURT OF APPEALS
for the
NINTH CIRCUIT

TGP COMMUNICATIONS, LLC, D/B/A THE GATEWAY PUNDIT,
AND JORDAN CONRADSON,

Plaintiffs-Appellants,

v.

JACK SELLERS, THOMAS GALVIN, BILL GATES, CLINT HICKMAN, STEVE
GALLARDO, STEPHEN RICHER, REY VALENZUELA, SCOTT JARRETT, MEGAN
GILBERTSON, AND MARCUS MILAM,

Defendants-Appellees.

On Appeal from the
United States District Court for the District of Arizona
No. 2:22-cv-01925-JJT
The Honorable John J. Tuchi

APPELLANT'S EXCERPTS OF RECORD
VOLUME 3 of 3

Marc J. Randazza
RANDAZZA LEGAL GROUP, PLLC
2764 Lake Sahara Drive, Suite 109
Las Vegas, Nevada 89117
Tel: 702-420-2001
ecf@randazza.com

David S. Gingras
GINGRAS LAW OFFICE, PLLC
4802 E. Ray Road, #23-271
Phoenix, AZ 85044
Tel.: (480) 264-1400
david@gingraslaw.com

Attorneys for Appellants

Exhibit 20

State Senator Michelle Ugenti Rita Has TGP Reporter Removed From Trump Rally And ARRESTED after She is Booed Off Stage (VIDEO)

By **Jordan Conradson**

Published July 24, 2021 at 11:34pm

3037 Comments



On Saturday, President Trump spoke at the Rally to Protect Elections in Phoenix, Arizona.





LIVE STREAM VIDEO: President Trump Speaks at TPUSA's "Rally to Protect Our Elections" in Phoenix, AZ – 6 PM ET ...More: 200,000 Watching Live on RSN

President Donald J. Trump speaks at a 'Rally To Protect Our Elections' sponsored by Turning Point USA. Trump is scheduled to speak at 6 PM Eastern time. The Gateway Pundit's Jordan Conradson and Julian Conradson are attending the rally today in Phoenix. There is A MASSIVE CROWD lined up to see President Trump today in ... Continue reading

GP The Gateway Pundit

The rally featured all candidates for Arizona's next Secretary of State, Governor, and U.S. Senator.

US Senate candidate Blake Masters gave a great speech on his America First agenda.



ER0284



AZ Senate Candidate Blake Masters at Trump Rally: “We Need to Break Up Google and Facebook and We Need to Punish Twitter” (Video)

Arizona Senate Candidate Blake Masters spoke at the ‘Rally To Protect Our Elections’ sponsored by Turning Point USA. President Trump is scheduled to speak at 6 PM Eastern. Blake Masters, a 34-year-old chief operating officer at investment firm Thiel Capital and native Arizonan, launched his campaign for US Senator from Arizona on Monday. Masters spoke ... Continue reading

GP The Gateway Pundit

Several local politicians were invited to speak at the rally today.

Arizona RINO State Senator Michelle Ugenti Rita also gave a speech but she was boomed off of the stage as her words were muffled by the crowd, turned angry mob.

In a contemptuous effort to save her speech, she yelled at her peasants
“I’m going to win the primary!”

See the hilariously sad “speech” in the video below.



ER0285

It wasn't planned either! This was an organic idea from the grassroots MAGA apparatus.

Crowd: BOO!

Ugenti-Rita: Pay attention...

Crowd: BOO!

Ugenti-Rita: We the people, We the people....

Crowd: BOO!

Ugenti-Rita: I'm running to be your next Secretary of State. I'm going to win the primary!

She'll win without us? Who has she struck a deal with?

After feeling the heat from the crowd of thousands, The Gateway Pundit's Jordan Conradson ran into her in another part of the arena.



He asked her why she killed Senator Kelly Townsend's chain of custody and election integrity bills.

Ugenti-Rita: Because it was bad

Conradson: Do you think that's why you got booed off stage?

Ugenti-Rita left the building when asked questions by Conradson. Shortly after, she came back, and when he saw her again, she told officers on sight that Conradson was harassing her.

The police did nothing because no laws were being violated.

Conradson compared this behavior to that of radical leftist Secretary of State Katie Hobbs, whose seat she is running for.

Roughly ten minutes later, Conradson was detained by event officials and escorted from the building for "harassing" Ugenti Rita.

After walking away, he called AZ State Senator Kelly Townsend, who encouraged him to come back peacefully and fight this.



While on the phone with the Senator and simply walking to meet her outside of the event, police grabbed Conradson and used handcuffs to put him in the back of a police car.

Conradson could hear police radios accusing him of being a member of the Proud Boys, a right-wing organization that the left has labeled as terrorists. Conradson has no affiliation with any political groups.

The police said he was facing a misdemeanor and a fine of up to \$900.

This tyrant violated Conradson's free press rights.

State Senator Kelly Townsend raised hell when this happened which is most likely what led to Conradson's release.

The officers dropped Conradson off at his vehicle and said that he is permanently banned from the venue.

Kelly Townsend: I think it's concerning that someone on our side has such disregard for the Constitution that she would seek to have a journalist arrested because he dared ask her a question about me that angered her. I am glad we were able to resolve the issue and correct what could have been a great miscarriage of justice.

After this fiasco, Michelle Ugenti Rita went to Twitter to trash the audit

I've been on the frontlines of the battle for election integrity for the last 10 years. I wrote the law banning ballot harvesting, cleaned-up our mail-in voter rolls, strengthened ID requirements just to name a few of my accomplishments, (1of5)



Something every candidate on that stage praised. I'll put my record of fighting for election integrity up against anyone. What I won't do is vote for "show" legislation that does nothing to strengthen election integrity and introduced for self serving reasons. (2of5)

There's too much at stake. Our election system is under constant assault by the left, and I won't support bills that fail to strengthen our election system. The same holds true for the audit. I **supported the audit, but I do not support the Trump audit any longer.** (3of5)

I wanted to review our election processes and see what, if anything, could be improved. Sadly, it's now become clear that the audit has been botched. The total lack of competence by @FannKfann over the last 5 months has deprived the voters of Arizona a comprehensive...(4of5)

Accounting of the 2020 election. That's inexcusable, but it shows what can happen when Republicans do not take election integrity deadly serious. (5of5)

Michelle Ugenti-Rita (MUR)

@MichelleUgenti · [Follow](#)



I've been on the frontlines of the battle for election integrity for the last 10 years. I wrote the law banning ballot harvesting, cleaned-up our mail-in voter rolls, strengthened ID requirements just to name a few of my accomplishments, (1of5)

6:47 PM · Jul 24, 2021



[Read the full conversation on Twitter](#)



149



Reply



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This is a lie. She has been nowhere near the frontlines of this battle. How would she know that the audit was botched? She hasn't even visited nor paid any attention whatsoever.

This was out of nowhere and was an obvious outlash at the MAGA movement for their scorn.

Michelle Ugenti Rita is out of the closet now.

It seems she has already started her party switch.

Michelle Ugenti Rita clearly will not win the primary unless she has made a deal.



3:43 / 3:43



ER0290

Submit a Correction



Jordan Conradson

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Maricopa County Supervisors Meeting TOMORROW (Wednesday) - AZ Patriots Sign Up To Speak By 8 AM

Turncoat Mike Pence Teases Potential 2024 Run Against President Trump

PATRIOTS IN ARIZONA: Document Your Affidavit Of Corrupted Voting Experience HERE

Kari Lake Speaks Out On BS Stolen Election: "Arizonans Know BS When They See It"

(VIDEO) Charlie Kirk Show Discusses Votes That Need To Be Cured - Republicans Must Cure Their Ballots And GOP Has Not Been Given The List, At Least One Dead Voter Discovered

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Marc J. Randazza, #027861
RANDAZZA LEGAL GROUP, PLLC
4974 S. Rainbow Blvd., Suite 100
Las Vegas, NV 89118
Tel: (702) 420-2001
ecf@randazza.com

David S. Gingras, #021097
GINGRAS LAW OFFICE, PLLC
4802 E. Ray Road, #23-271
Phoenix, AZ 85044
Tel.: (480) 264-1400
Fax: (480) 248-3196
David@GingrasLaw.com

John C. Burns, MBE# 66462*
Burns Law Firm
P.O. Box 191250
Saint Louis, MO 63119
Tel: 314-329-5040
Fax: 314-282-8136
TBLF@pm.me

Attorneys for Plaintiffs
TPG Communications, LLC and Jordan Conradson

**pro hac vice forthcoming*

**UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

TGP Communications, LLC, *et al.*,

Plaintiffs,

v.

Jack Sellers, *et al.*,

Defendants.

Case No. 2:22-cv-01925-JJT

**NOTICE OF FILING EXHIBITS IN
SUPPORT OF EMERGENCY
EX PARTE MOTION FOR
TEMPORARY RESTRAINING
ORDER AND REQUEST FOR
JUDICIAL NOTICE**

Plaintiffs TGP Communications, LLC d/b/a The Gateway Pundit and Jordan Conradson ("Plaintiffs") file the attached exhibits in support of to its Emergency *Ex Parte* Motion for Temporary Restraining Order (Dkt. No. 7) and the hearing set thereupon for November 17, 2022.

Exh. #	Date	Author	Title
1	05/06/2021	Jim Hoft	“Why Are You Working So Hard to Shut the Audit Down? What Are You Hiding” – TGP Reporter Confronts AZ Secretary of State Katie Hobbs — Katie Hobbs Runs! (VIDEO)
2	09/20/2021	Jordan Conradson	EXCLUSIVE... Maricopa County Supervisor Steve Chucri Caught in Leaked Recording: The Maricopa County Voting Machine Company Audit and Recount – “Was Pretty BULLSH*T By The Way” (AUDIO)
3	09/21/2021	Jordan Conradson	EXCLUSIVE: Maricopa County Supervisor Steve Chucri on 2020 Election in Leaked Recording: “I Think It Was Done Through DEAD PEOPLE Voting. I Think IT WAS MULTIFACETED – BALLOT HARVESTING” (AUDIO)
4	09/21/2021	Jordan Conradson	BREAKING: Maricopa County Supervisor Steve Chucri RESIGNS From Office After TGP Exposé: “There Was No Cover-Up, The Election Was Not Stolen. Biden Won.”
5	09/23/2021	Jordan Conradson	BREAKING: County Supervisor Steve Chucri Leaked Audio: “I’ve Had DEMOCRATS Telling Me They Don’t Have Confidence, They Don’t Like DOMINION – Why In The World Would Governor Ducey Really Say No To Giuliani?”
6	09/23/2021	Jordan Conradson	Leaked Audio... Maricopa County Supervisor Steve Chucri: “Dominion, Whether They’re Right or Wrong... The Damage Is Done”
7	09/27/2022	Jordan Conradson	BREAKING: Maricopa County Creates “Ministry Of Truth” To Silence The Gateway Pundit – Now Requiring Official Press Pass For Media “To ENTER ITS FACILITIES And/Or Cover Events Related To The 2022 General Election”
8	12/04/2021	Jordan Conradson	EXCLUSIVE: Former Maricopa County Recorder Steve Chucri Full January Phone Call With We The People AZ Alliance: “I Think It Was DONE Through

			Dead People Voting; I Think It Was Multifaceted” (AUDIO)
9	03/23/2022	Jordan Conradson	MUST SEE VIDEO: Arizona Secretary of State Katie Hobbs RUNS From TGP’s Jordan Conradson AGAIN— Won’t Answer Questions At Free and Fair Elections Event
10	10/01/2022	Jordan Conradson	BREAKING: Maricopa County ‘s Ministry of Truth BLOCKS The Gateway Pundit Reporter Access To 2022 Midterm Election Coverage In County

To the extent necessary, Plaintiffs request that the Court take judicial notice of these articles published on The Gateway Pundit relating to Maricopa County, its elections, and its officials.

Under Federal Rule of Evidence 201(b), a court may judicially notice a fact “not subject to reasonable dispute in that it is either (1) generally known within the territorial jurisdiction of the trial court or (2) capable of accurate and ready determination by resort to sources whose accuracy cannot reasonably be questioned.”” *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 593, n.11 (2007). Judicial notice is proper for the purpose of acknowledging that certain information was published on a party’s website even where the facts contained within them are in dispute. *See Thermolife Int’l LLC v. BPI Sports LLC*, No. CV-20-02091-PHX-SPL, 2021 U.S. Dist. LEXIS 31700, at *6 (D. Ariz. Feb. 19, 2021).

Plaintiffs solely request judicial notice of the existence of the articles and of the subject matter discussed therein. These articles have a direct relation to the matters at issue in Plaintiffs’ Motion, as they relate to The Gateway Pundit and Jordan Conradson’s past and continued reporting on issues relating to Maricopa County and its elections. Plaintiffs do not extend their request to the veracity of any claims made in the article or otherwise ask the Court to wade into matters that could be subject to factual dispute.

Dated: November 15, 2022.

Respectfully submitted,

/s/ Marc J. Randazza

Marc J. Randazza, #027861
RANDAZZA LEGAL GROUP, PLLC
4974 S. Rainbow Blvd., Suite 100
Las Vegas, Nevada 89118

David S. Gingras, #021097
GINGRAS LAW OFFICE, PLLC
4802 E. Ray Road, #23-271
Phoenix, AZ 85044

John C. Burns, MBE# 66462*
BURNS LAW FIRM
P.O. Box 191250
Saint Louis, MO 63119

Attorneys for Plaintiffs
TPG Communications, LLC and
Jordan Conradson

**pro hac vice forthcoming*

Case No. 2:22-cv-01925-JJT

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 15, 2022, a true and correct copy of the foregoing document is being served upon counsel for Defendants via electronic mail and U.S. Mail at the following address:

Thomas Liddy
Maricopa County Attorney's Office
225 West Madison Street
Phoenix, AZ 85003
<liddyt@mcao.maricopa.gov>

/s/ Marc J. Randazza
MARC J. RANDAZZA

RANDAZZA | LEGAL GROUP

Exhibit 1

Article: “Why Are You Working So Hard to Shut the Audit Down? What Are You Hiding” – TGP Reporter Confronts AZ Secretary of State Katie Hobbs — Katie Hobbs Runs! (VIDEO)”

The Gateway Pundit
May 6, 2021

“Why Are You Working So Hard to Shut the Audit Down? What Are You Hiding” – TGP Reporter Confronts AZ Secretary of State Katie Hobbs – Katie Hobbs Runs! (VIDEO)

By Jim Hoft

Published May 6, 2021 at 5:02pm

5790 Comments



Earlier this afternoon The Gateway Pundit reporter confronted far left Arizona Secretary of State Katie Hobbs following her interview with local news.

Hobbs has been working day and night to interfere with, slander, and attempt to shut down the Senate Audit of the Maricopa County ballots and voting machines.

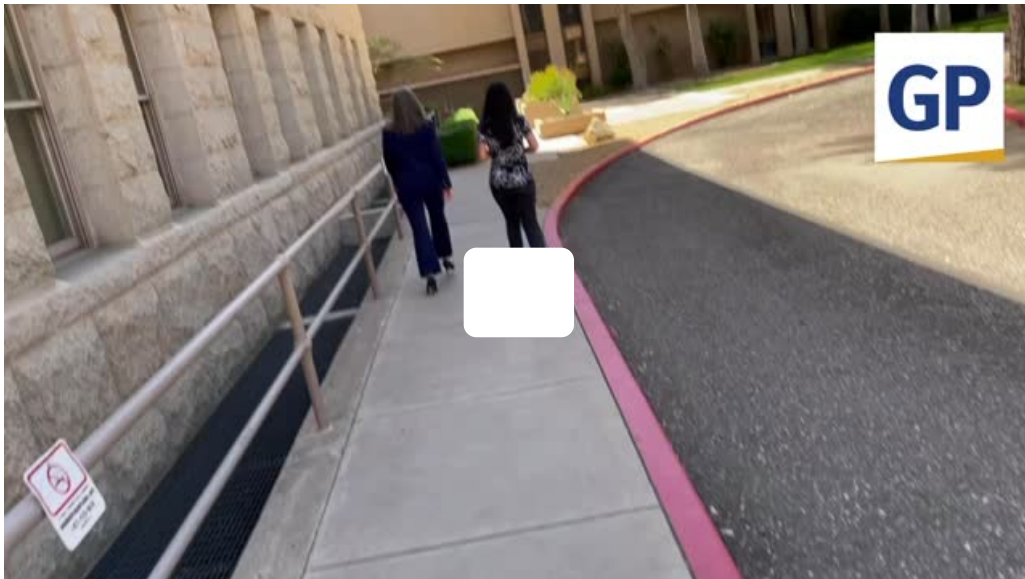
Jordan did not let the opportunity to question Hobbs to pass him by.

Jordan Conradson told The Gateway Pundit this afternoon asked to speak to Hobbs and her assistant blocked me. Then when they started walking away “I was like f*ck it and ran after her.”

Jordan Conradson: “Secretary Hobbs, why are you sending top Democrat operatives into Arizona audit and hiding it from the officials?... Why are you working so hard to shut the audit down?... What are you hiding?... Isn’t it your job to be nonpartisan?... You called this a Republican audit, this is an audit for the people... Secretary Hobbs, do you have any comments?”

Katie Hobbs ran and refused to answer a SINGLE QUESTION!

WATCH:



Submit a Correction



Jim Hoft

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Jim Hoft is the founder and editor of The Gateway Pundit, one of the top conservative news outlets in America. Jim was awarded the Reed Irvine Accuracy in Media Award in 2013 and is the proud recipient of the Breitbart Award for Excellence in Online Journalism from the Americans for Prosperity Foundation in May 2016.

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ER0300

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ER0301

Exhibit 2

Article: “EXCLUSIVE... Maricopa County Supervisor Steve Chucuri Caught in Leaked Recording: The Maricopa County Voting Machine Company Audit and Recount – “Was Pretty BULLSH*T By The Way” (AUDIO)”

The Gateway Pundit
September 20, 2021

EXCLUSIVE... Maricopa County Supervisor Steve Chucuri Caught in Leaked Recording: The Maricopa County Voting Machine Company Audit and Recount – “Was Pretty BULLSH*T By The Way” (AUDIO)

By [Jordan Conradson](#)

Published September 20, 2021 at 7:45pm

4428 Comments



The Gateway Pundit has obtained an exclusive audio recording of a meeting with Maricopa County Supervisor Steve Chucuri and [We The People AZ Alliance](#).

The Arizona audit [report](#) will be made public this Friday.

Will Chucuri stay silent when he knows exactly what happened?

BREAKING: AZ Candidate For Secretary of State Mark Finchem: “I Call On Arizona To Decertify The Election Of 2020 And Recall The Electors... We Have A Duty To Act” – 96K+ GHOST VOTES

On March 22nd, 2021, Steve Robinson and Shelby Busch met with Steve Chucuri to push for Maricopa County’s cooperation with a full forensic audit by the Arizona Senate.

These brave Patriots have decided that it is time to release the tapes now that the audit report is in preparation and the county officials will not stop lying.



ER0303

Chucri was the only Supervisor willing to meet with residents of Maricopa County to discuss serious election concerns, which he shared.

x

Chucri seemed to agree with the majority of voters who were calling for an audit.



We The People AZ Alliance is a citizen-led organization that has played an extreme role in pushing elected officials to act on election concerns with a full forensic audit.

They are not connected to the Arizona Senate audit investigation. They are private, concerned citizens in the grassroots movement, who want to see elected officials fight for the people.

Throughout the meeting, Chucri ripped his colleagues for not standing up for voting rights or cooperating with the Senate.

Chucri even said that the county's audit, led by the companies that certified the equipment, was "bullsh*t" and said he thinks his colleagues are afraid of an audit because of how close their races were.

We **reported** on the county's bogus early audits several times.

Maricopa County Board of Supervisors' Chairman, Jack Sellers, Has Close Ties with China - Is This Why He's Fighting So Hard Against the Senate's 2020 Election Audit in Maricopa County?

Here is the audio transcript:

Busch: That was my point too. Even if they do not have political aspirations beyond this and they're done, why allow this to now erase anything that

you have accomplished.

Chucris: Right, Exactly. I'm committed to people, I wanted to take out Adrian Fontes too and we did, I'm proud of that. That Guy's a scumbag. And so why would we stop?

Busch: I dont know what happened to your colleagues.

Chucris: I dont either.

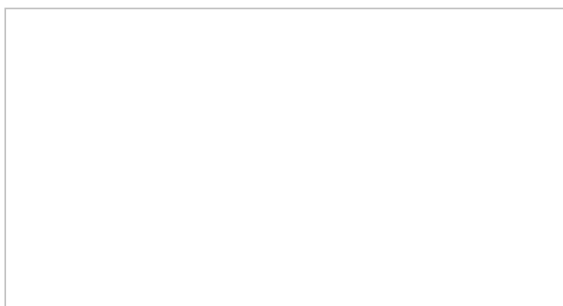
Busch: But Im hoping you can reel them back in and if we can deliver to the masses a good message, then we can turn this whole ship around.

Robinson: And if not, at least my conscience is clear that we tried.

Chucris: Right, right, right. I mean, you're surprised about that, as I am. Because remember what I said to Senator Fann. Remember, and ask her this, and remember what I said to Michelle Ugenti, "This isn't going to be a problem. My guys are gonna agree with me."

Busch: Yeah you told us that when we met with Guliani.

Chucris: And I said to Fann, "Hey, just as good measure, where you call everybody and saying, hey, you know you're supportive of an audit, and that would be great," including Gallardo when she did. Never in a million years. **You know what I think it was, in hindsight. Gates got scared because he barely won. And Jack got scared because he only won by 200 votes, and then there was an audit and a recount, which was pretty bullshit, by the way.** What would happen in those two races? And that is way too self-serving.



"Scumbag" Adrian Fontes was the Maricopa County Recorder during the 2020 election.



ER0305

Chucri also met with Rudy Giuliani, Col. Phil Waldron, Shelby Busch, and Steve Robinson in December.

x

In another recording, Chucri said, “I like Col. Waldron, I don’t think he’s a crazy nut job. That guy’s pretty sharp. Very sharp... He’s not a bad actor.”

Steve Chucri knew that this audit was not up to shape and that this election had serious issues. He also states that his colleagues could be opposing an audit in order to stay in office.

He is in derelict of his duties to the people.

Why does Steve not speak up about this corruption?

What would compel him to vote contrary to his conscience?

What is compelling the other supervisors?

Steve needs to do what is right. He needs to come clean and tell us the truth.

Stay tuned for more.

[Submit a Correction](#)



Jordan Conradson

[Turncoat Mike Pence Teases Potential 2024 Run Against President Trump](#)

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ER0307

Exhibit 3

Article: “EXCLUSIVE: Maricopa County Supervisor Steve Chucuri on 2020 Election in Leaked Recording: “I Think It Was Done Through DEAD PEOPLE Voting. I Think IT WAS MULTIFACETED – BALLOT HARVESTING” (AUDIO)”

The Gateway Pundit
September 21, 2021

EXCLUSIVE: Maricopa County Supervisor Steve Chucri on 2020 Election in Leaked Recording: “I Think It Was Done Through DEAD PEOPLE Voting. I Think IT WAS MULTIFACETED – BALLOT HARVESTING” (AUDIO)

By [Jordan Conradson](#)

Published September 21, 2021 at 1:29pm

3374 Comments



Maricopa County Supervisor Steve Chucri has been busted in leaked audio recordings where he tells the truth about the Maricopa County 2020 election.

Chucri said that the extremely small-scale audit, performed by Maricopa County and used to declare this election was free and fair, was actually “[pretty bullshit](#)”.

EXCLUSIVE... Maricopa County Supervisor Steve Chucri Caught in Leaked Recording: The Maricopa County Voting Machine Company Audit and Recount – “Was Pretty BULLSH*T By The Way” (AUDIO)

The Gateway Pundit has been reporting this for months.

How Can the Government Agency Certifying Elections (the EAC) Maintain Its Independence When Its CIO Previously Worked for 10 Years for Dominion Voting Systems?

In a March 22nd meeting with [We The People AZ Alliance](#), Chucri told Shelby Busch and Steve Robinson that his colleague [Clint Hickman](#) “didn’t have the guts” to do a real audit.



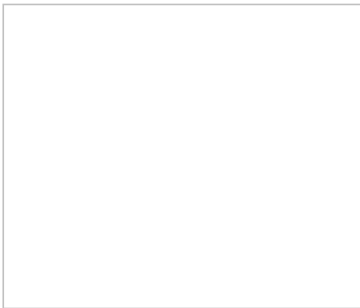
ER0309

“I should have never believed what I was being told”, Chucri said after believing that they could only audit approximately 47,000 ballots out of nearly 2.1 million.

x

Chucri knew that Maricopa County needed a comprehensive full forensic audit to find the truth.

In a recorded phone call on January 22, Chucri shared what he really thinks happened before he agreed to perform an audit of only 2% of the ballots, and fought against audit efforts in unity with the Maricopa County Board of Supervisors.



Chucri: I think it was done through dead people voting. I think it was multifaceted.

Busch: They threw everything but the kitchen sink at these elections. The information, the data we have is incredible. USA Today has put out a hit piece on our organization stating that the information we provided at our rally was conspiracy and unfounded truth. We have the evidence. We have the voter rolls. We have it, but they don't want to admit it and you're right it was multi-layered. It was dead voters

Chucri: Ballot harvesting, ballot harvesting!

Steve Chucri knew exactly what types of security issues were encountered, yet he did nothing to look into this.

Instead, he continues to aid the Supervisors and crooked Secretary of State Katie Hobbs in their cover-up of this fraudulent election.

They tried to prevent a **canvass** because they knew we would find issues like lost votes, and ghost votes, or phantom voters.

**WATCH - HUGE: Liz Harris On Steve Bannon's War Room: Arizona
Canvassing Efforts - WHERE DID THESE VOTES GO?! 173,104 LOST
VOTES - 96,389 GHOST VOTES**

x

Chucri knew that this was a fraudulent election.

The Arizona audit [report](#), to be released on Friday, will show us what else he knew about.

**BREAKING: FINAL AZ Audit Report Hearing Scheduled - Results To Be
Released NEXT FRIDAY Sept. 24th at 1:00 PM**

Chucri needs to come forward.

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Jordan Conradson

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Exhibit 4

Article: “BREAKING: Maricopa County Supervisor Steve Chucris RESIGNS From Office After TGP Exposé: “There Was No Cover-Up, The Election Was Not Stolen. Biden Won.””

The Gateway Pundit
September 21, 2021

BREAKING: Maricopa County Supervisor Steve Chucri RESIGNS From Office After TGP Exposé : “There Was No Cover-Up, The Election Was Not Stolen. Biden Won.”

By Jordan Conradson

Published September 21, 2021 at 10:44pm

10648 Comments



Maricopa County Supervisor Steve Chucri has announced his resignation from office effective November 5.

Yesterday, The Gateway Pundit reported that Steve Chucri said the Maricopa County-led post-election audit was “bullsh*t”.

He also **stated** that his colleagues, Supervisors Bill Gates and Jack Sellers may just be afraid of an audit because they had close races.

EXCLUSIVE... Maricopa County Supervisor Steve Chucri Caught in Leaked Recording: The Maricopa County Voting Machine Company Audit and Recount – “Was Pretty BULLSH*T By The Way” (AUDIO)

We also reported that Chucri believes there was “**multifaceted**” election fraud, with dead voters and ballot harvesting.

EXCLUSIVE: Maricopa County Supervisor Steve Chucri on 2020 Election in Leaked Recording: “I Think It Was Done Through DEAD PEOPLE Voting. I Think IT WAS MULTIFACETED – BALLOT HARVESTING” (AUDIO)

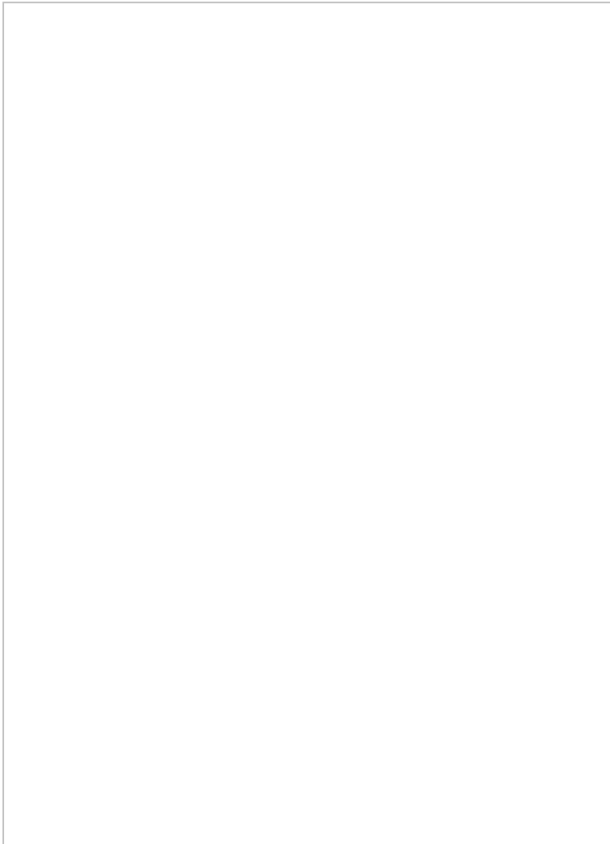
Chucri threw Supervisor Clint Hickman under the bus for their “bullsh*t” audit where they only audited 2% of the ballots.

x

He said that his biggest mistake was believing Hickman that they could not audit more than 2% of the ballots, and that Hickman “just didn’t have the guts”.

EXCLUSIVE: Maricopa County Supervisor Steve Chucri In Leaked Recording on Fellow Supervisor: Hickman “Just Didn’t Have The Guts” - LIED To Stonewall A REAL Audit (AUDIO)

Now that we have exposed his behind-the-scenes rhetoric, which is inconsistent with his actions and public statements, Steve Chucri is quitting.



It’s hard to believe I have been involved in Arizona politics now for 28 years. When I first ran for Maricopa County Supervisor in 2012, I campaigned to bring civility, innovation and most importantly, a business mindset to government making it “Best in Class”. We got off to a wonderful start and have had many successes. Successes that I will always be proud to have played a role in.

Unfortunately, the political landscape changed for the worst this year. The environment is wrought with toxicity – and all civility and decorum no longer seem to have a place. **The fixation with the 2020 election results and aftermath have gotten out of control. In recent days it has come to light that I was secretly recorded in conversations regarding differences with some of my colleagues about an audit of the 2020 election. The comments I made were during a very turbulent time.** My colleagues have every right to be both angry and disappointed with me. I should not have made such statements and offer my colleagues heartfelt apologies.

I do not want to perpetuate the very problem I ran to eliminate several years ago. While I have had my differences with my colleagues, I have known them to be good, honorable and ethical men. The picture some individuals are trying to paint about a cover up, scam and other nonsense about my colleagues and myself is simply false. There was no cover-up, the election was not stolen. Biden won.

While the comments were critical, it doesn't change the fact that I have had the pleasure and honor to serve with these fine men and the dedicated employees of Maricopa County. It has also been my honor to represent my District 2 constituents for 9 years. It is time for me to step aside and let the County and my colleagues meet the true potential of being the 4th largest and fastest growing county in America.

Effective November 5, 2021 I will resign my office.

He doesn't believe that Joe Biden won. Chucri thinks it was done through dead people voting, and ballot harvesting.

Notice how he doesn't even deny anything he said but covers it with more lies.

Truly, Steve was bullied and silenced by his peers because he pushed for a full forensic audit, and he just wanted to be Chairman of the board.

Why would we believe that he wasn't bullied into this resignation?

He does not sincerely believe anything he is saying about his colleagues and we will reveal this over the coming days.

The Arizona Audit report will be released this week as well.

X

BREAKING: FINAL AZ Audit Report Hearing Scheduled – Results To Be Released NEXT FRIDAY Sept. 24th at 1:00 PM

Resignation is not good enough. Steve needs to come clean.

Submit a Correction



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Exhibit 5

Article: “BREAKING: County Supervisor Steve Chucuri Leaked Audio: “I’ve Had DEMOCRATS Telling Me They Don’t Have Confidence, They Don’t Like DOMINION – Why In The World Would Governor Ducey Really Say No To Giuliani?””

The Gateway Pundit
September 23, 2021

BREAKING: County Supervisor Steve Chucri Leaked Audio: “I’ve Had DEMOCRATS Telling Me They Don’t Have Confidence, They Don’t Like DOMINION – Why In The World Would Governor Ducey Really Say No To Giuliani?”

By [Jordan Conradson](#)

Published September 23, 2021 at 6:35pm

310 Comments



The Gateway Pundit has obtained exclusive audio recordings of Maricopa County Recorder Steve Chucri expressing his doubts in the election and his despise for his colleagues.

Chucri says many hateful things about his colleagues who fought against a full forensic audit of the 2020 election because he knows that there was fraud in 2020 and they are trying to sweep it under the rug.

In one recording Chucri states that he believes “**multifaceted**” election fraud occurred with dead voters and illegal ballot harvesting.

Maricopa County Board of Supervisors’ Chairman, Jack Sellers, Has Close Ties with China – Is This Why He’s Fighting So Hard Against the Senate’s 2020 Election Audit in Maricopa County?

In another, he admits that the Maricopa County audit of the 2020 election was “**bullsh*t**” and that his colleagues were too scared to do an audit.

Supervisor Bill Gates “has the backbone of a plastic fork” according to Chucri.

Supervisor Clint Hickman “just didn’t have the guts” either.

BREAKING - LEAKED AUDIO: Maricopa County Supervisor Steve Chucri Admits: "I DON'T FEEL COMFORTABLE WITH DOMINION" - And County Recorder Stephen Richer AGREES!

x

In this release, Steve Chucri gives his true feeling about the public perception of the election.

He also says that his colleagues do not have a backbone again and loops Governor Doug Ducey into the conversation, saying it looks like Ducey has something to hide.

January

Chucri: People are trying to say "oh this is the far right, these are just the Trumpers." No it's not! This is middle-of-the-road republicans too like my 82-year-old mother, my contractor building a house for me, same thing! I've had Democrats telling me they don't have confidence, they don't like this Dominion. So look, I think we have to do an audit to see what happened or didn't happen.

March

I still think even though all of these audits have been done, I still think there's a lot of uneasiness not even from Republicans. I'm just talking about people you don't even know, I don't even know, they're just your average Arizonan that still has doubts, like my mother.

I've even had democrats email me about it.

They just don't have backbone. Why in the world would Governor Ducey really say "no" to sit down with Guliani. I mean it only makes it look like you have something to hide.

A majority in the country knows that this election is not what Maricopa County pretends.

How could Steve do this to his own mother?

In another audio recording, published earlier today, Steve Chucri acknowledges that elections problems occurred in all of the states that used



ER0321

Dominion “**so it’s not just like it was an isolated incident with no proof.**”

x

He also rips into his colleagues and attorneys for preventing this audit, giving us more clues into what was happening behind the scenes.

BREAKING – LEAKED AUDIO: Maricopa County Supervisor Steve Chucri Admits: “I DON’T FEEL COMFORTABLE WITH DOMINION” – And County Recorder Stephen Richer AGREES!

The Supervisors knew this election was stolen and they did nothing!

Submit a Correction



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Exhibit 6

Article: “Leaked Audio... Maricopa
County Supervisor Steve Chucri:
“Dominion, Whether They’re Right or
Wrong... The Damage Is Done”

The Gateway Pundit
September 23, 2021

Leaked Audio... Maricopa County Supervisor Steve Chucri: “Dominion, Whether They’re Right or Wrong... The Damage Is Done”

By Jordan Conradson

Published September 23, 2021 at 9:58pm

948 Comments



The Gateway Pundit has more leaked audio of Maricopa County Supervisor Steve Chucri talking about his desire for an Arizona Senate audit of the fraudulent election his colleagues’ contempt for the voters.

Chucri said many horrible things about his colleagues, the election, and he actually admitted that County-led audit was “bullsh*t”.

These releases have totally destroyed the County’s false narrative about their “bullsh*t” audit being legitimate.

EXCLUSIVE... Maricopa County Supervisor Steve Chucri Caught in Leaked Recording: The Maricopa County Voting Machine Company Audit and Recount – “Was Pretty BULLSH*T By The Way” (AUDIO)

Chucri also said that he had democrats **emailing** him because they did not feel comfortable with Dominion.

He agreed with them and so did Maricopa County Recorder Stephen Richer.

BREAKING – LEAKED AUDIO: Maricopa County Supervisor Steve Chucri Admits: “I DON’T FEEL COMFORTABLE WITH DOMINION” – And County Recorder Stephen Richer AGREES!

This “**multifaceted**” election fraud with dead voters and ballot harvesting did not just occur in Arizona though. Steve Chucri said that this was a

These recordings came from **We The People AZ Alliance's** Steve Robinson and Shelby Busch.

Steve has **resigned** from office effective November 5th because he could not take the heat.

This recording from March gives us more from Steve Chucri uncensored.

Chucri: We really gotta crackdown on the ballot harvesting and some of these things.

I agree with you on Dominion, I agree with you on the mask mandate and I agree with you we should have never fought.

We aren't going to investigate one of our own. Why would we fight a third party meaning the legislature to come in? If we feel so confident about our audit why wouldn't we bring someone else in to look at it? What is the problem and harm in that?

After I met with Giuliani after we were all there together "we're not going to have a problem with an audit. Are you kidding me?" Oh my god was I wrong?

I said shame on us for you having to do what you've done.

Tom Liddy really overstepped his bounds. In fact, I'm going to have some conversations with the County Attorney. Attorneys should give input and that's it. They shouldn't talk between you and I as supervisors and something I tell you intercedes, that's just wrong. **And Tom Liddy was arrogant.**

What do you gain from fighting all the time? You don't gain anything. The lawyers win because they're getting paid all the money but you don't gain anything and so I said to my colleagues, why would we fight our own Senate? Now, look Warren Peterson can lead with his chin and he can be a cocky SOB.

Put yourself in my position, the only voice that was opposing all of them and really our county attorney's office. It just made no sense to do what they did.

I think one thing Karen did learn is it ain't easy to find a good auditor that's credentialed and everything else. As much as I like Colonel Waldron, I don't think he's a crazy nutjob like some are trying to put him out. That guy's very sharp. I think the term Patriot has been overused but he's a good American. I grew up in the car business, I've been screwed by the best so I know the bad actors out there. He is not a bad actor.

Richer's been good. He caught on about what Liddy was doing very quickly and it was me and him against the other supervisors.

If we didn't pick somebody and the Senate did, of their own volition, I think that's smart just like I go back to the MCSO thing. You don't bring in your same department to investigate one of your own. You bring an outside department in to do it and that's what I've always been supportive of.

Robinson: Everybody feels like the Board of Supervisors protected the County but none of them protected the voter base, the people.

CHUCRI: THAT'S A GOOD WAY TO PUT IT.

Which is sad which we all should be celebrating because we actually took elections back from Adrian Fontes who is a very bad dude.

Liddy kept pointing to his record of wins, and that's dangerous. That's not why we're in this business.

I think Gates knows this could be it for him, so maybe that will help him come around, which is sad, it shouldn't cost you an election to come and do the right thing. It should be the right thing and whatever happens, happens. Jack is Jack.

I think I was too nice to my colleagues by not being more vocal, to not put them in a bad spot, but I'm done, but I'm done.

But let's say there's nothing wrong with Dominion, it's like Tylenol in the '80s. Remember when somebody laced Tylenol? how long did it

take for them to build that credibility back? And so I don't care if anything is found or not found on Dominion it's gonna be so hard to build that credibility back for next year. And then we're right back in the same place.

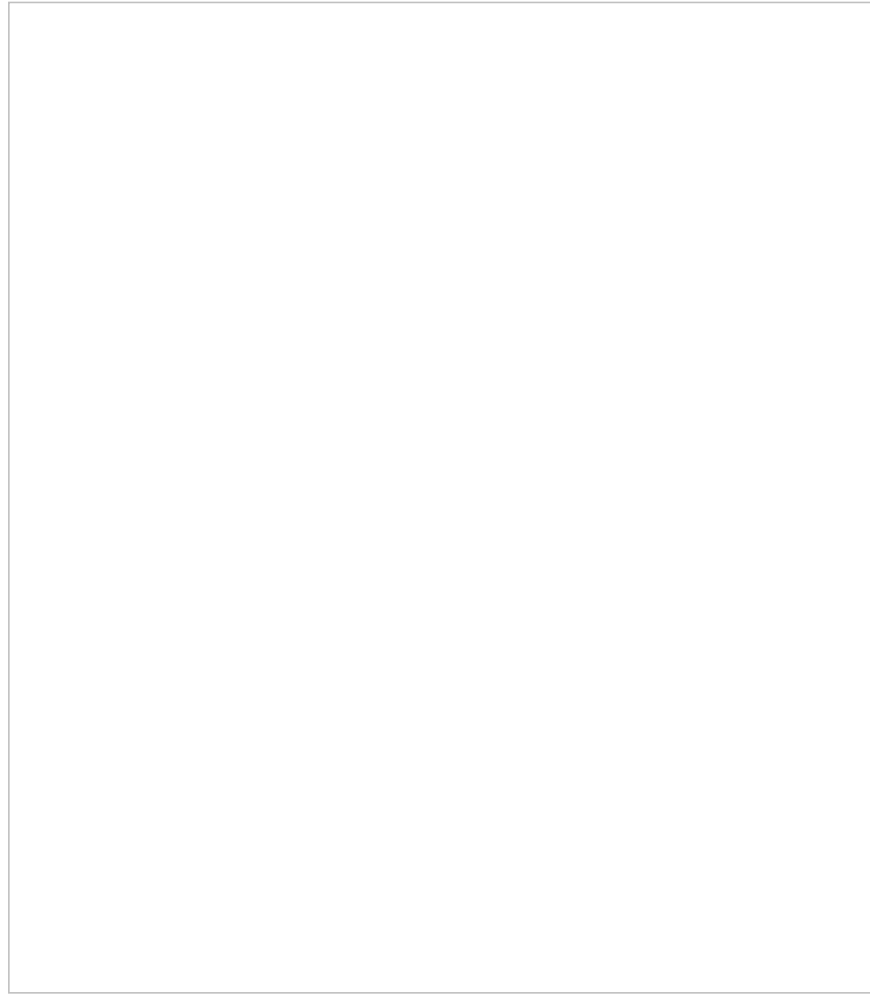
Well, I'll tell you what you've got my support on that because I totally agree with you just because of the sheer fact that so many of the public has a doubt about it.

At a minimum, I'm happy to say that I would like to see an RFP for a new company to come in because so much doubt has been cast on Dominion that no matter where your political stripes might lay, because I've heard from Democrats and Republicans that are concerned about Dominion.

At some point, they're gonna see it.

None of them will get re-elected.

I have already brought to my colleagues' attention primarily Jack since he's current Chairman, that we need to look at something else for tabulation next year, because Dominion, whether they're wrong, right, or indifferent it is what it is. The damage is already done.



Jack Sellers, Chairman of the Maricopa County Board of Supervisors

Busch: They will be calling for heads on a swivel

Chucri: Rightfully so because that would mean whoever we had as auditors were horrible and we picked them...

It seems like Tom Liddy owns the Board of Supervisors and calls all of the shots. What is going on here?

Why did Chucri vote unanimously with the Board of Supervisors to spend \$2.8 million on brand new Dominion voting machines after the old machines were audited?

How Can the Government Agency Certifying Elections (the EAC) Maintain Its Independence When Its CIO Previously Worked for 10 Years for Dominion Voting Systems?

Supervisor Bill Gates claims that all of this is “elections misinformation” but we have it from the horse’s mouth.

Georgia's Corrupt Republican Leadership Gave Joe Biden Win By Less Than 12,000 Votes – Yet 460,000 Drop Box Ballots STILL MISSING Chain of Custody Documentation Required by Law

X

To Steve Chucri:

These people silenced you and prevented you from doing the right thing, and look who paid the price.

Your political career is over and you are now the most unpopular man in Arizona, but anybody can be redeemed.

Come clean, Steve. Make this right.

Submit a Correction



Jordan Conradson

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Exhibit 7

Article: “BREAKING: Maricopa County Creates “Ministry Of Truth” To Silence The Gateway Pundit – Now Requiring Official Press Pass For Media “To ENTER ITS FACILITIES And/Or Cover Events Related To The 2022 General Election””

The Gateway Pundit
September 27, 2021

BREAKING: Maricopa County Creates “Ministry Of Truth” To Silence The Gateway Pundit – Now Requiring Official Press Pass For Media “To ENTER ITS FACILITIES And/Or Cover Events Related To The 2022 General Election”

By Jordan Conradson

Published September 27, 2022 at 9:32pm

1087 Comments



Maricopa County is already covering its tracks ahead of the 2022 General Election with what some are calling a “Ministry of Truth” to prevent real media and honest questions.

“Maricopa County will require an official Press Pass for members of the press to enter its facilities and/or cover events related to the 2022 General Election,” **stated** a new order from the County.

In order to register for a press credential, reporters must provide the following information, agree and sign their name attesting to the following:

By signing this application for a Maricopa County Press Pass, I certify that I am a journalist without a conflict of interest or association that would compromise my journalistic integrity.

Further, I do not receive compensation or special treatment from advertisers or political organizations that would influence my coverage related to Maricopa County or its elections.

I am not a lobbyist, advertiser, paid advocate or influencer for any individual, political party, corporation, or organization.

x

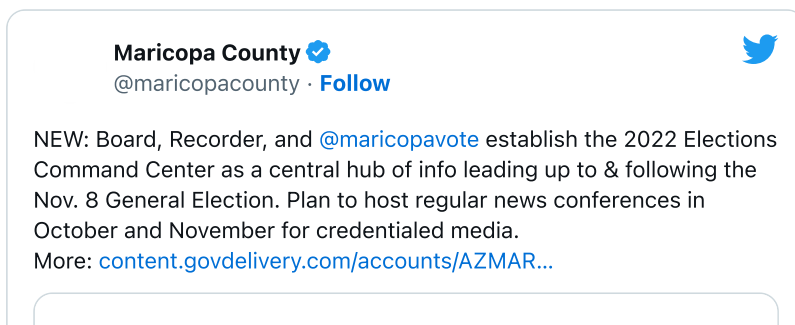
Therefore, no left-wing media outlet should be allowed to cover the election. However, that is probably not the case.

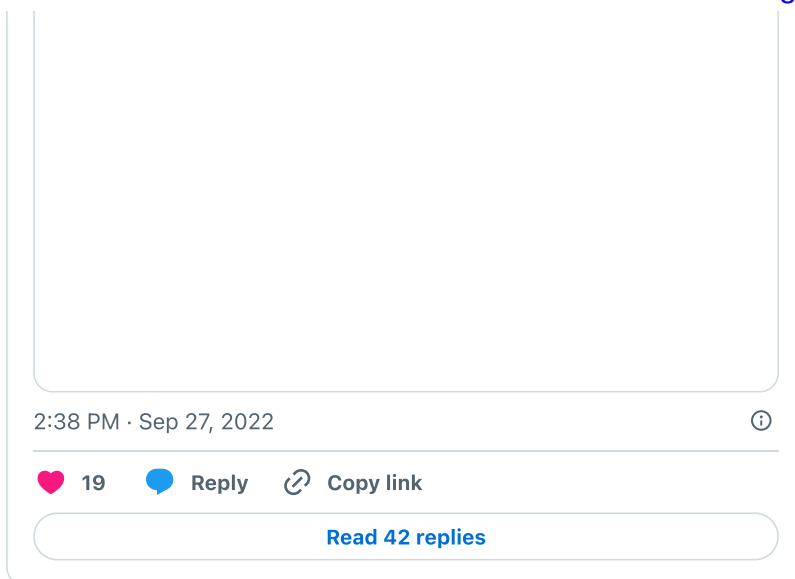
This is part of an announcement of the newly formed “Elections Command Center to Share Info with Voters, Combat Disinformation.”

The Gateway Pundit previously reported on these same tactics employed by the Biden Regime. After announcing the Biden Regime’s failed “**disinformation governance board**,” the White House later announced a new program called “the White House Task Force to Address Online Harassment and Abuse.” This was created to “address” (silence) what the government deems to be “online harassment, abuse, and disinformation campaigns.”

‘Ministry of Truth’ 2.0: Kamala Harris to Lead New Task Force Targeting “Online Harassment, Abuse, and Disinformation Campaigns”

Maricopa County shared the following message on Twitter announcing the newly formed “Command Center.”





The official **announcement** states,

Maricopa County Forms Elections Command Center to Share Info with Voters, Combat Disinformation

Six elected officials and a team of elections and communications professionals are coming together as one ahead of the 2022 November General Election in Maricopa County. Today, Board of Supervisors Chairman Bill Gates and Recorder Stephen Richer established the “2022 Elections Command Center” which will serve as a central hub of information for the weeks leading up to and following the Nov. 8 General Election.

“At the beginning of the year, I promised we would run the most transparent elections this county has seen, and I’m proud of what the Board of Supervisors, the Recorder’s Office, and our elections team have done to date,” said Chairman Bill Gates, District 3. “The Command Center will further deliver on that promise by creating a structure that allows us to reach more people, faster, with factual information about how elections are run and how people can successfully participate.”

“We ran a terrific Primary Election, but because of our ‘continuous improvement’ work ethic, we will have an incredible communications team assembled that will allow us to better respond to constituent concerns and combat misinformation during the General Election,” said Maricopa County

Recorder Stephen Richer. “I look forward to partnering with the Board of Supervisors to make this a great election for Maricopa County voters.”

The Elections Command Center will bring together communicators and subject matter experts from the Elections Department, Recorder’s Office, County Manager’s Office, and other county agencies for the following purposes:

- Clear, consistent communication about voting deadlines and election processes to Maricopa County’s more than 2.4 million eligible voters which enables them to cast their ballot in the way they choose.
- Outreach and response to local, national, and international media covering Arizona elections
- Quick and accurate response to mis-, dis-, and mal-information related to the administration of elections in Maricopa County
- Updates on tabulation and reporting of results following Election Day

Starting today, all media requests related to the November General Election in Maricopa County should be directed to the Elections Command Center using the following email address:

media@risc.maricopa.gov. This applies to requests for interviews as well.

The Elections Command Center will host regular news conferences in October and November for credentialed media. Reporters interested in getting credentialed can [apply here](#). News conferences will also be streamed live via social media for members of the public.

For reliable information about Maricopa County election administration, visit elections.maricopa.gov and follow Maricopa County, Maricopa County Elections Department, and Maricopa County Recorder’s Office on [social media](#).

Arizona GOP Chairwoman Dr. Kelli Ward told The Gateway Pundit,

Ward: Suppression of the free press by a government entity is a clear violation of the First Amendment. Arizona does not want or need its own “Ministry of Truth.” Again, what is Maricopa County trying to hide? Especially regarding elections?

Liberal Hack journalist Jen Fifield, the same “reporter” who got **smacked down by Save America attorney Christina Bobb and Vernon Jones** at the



Arizona audit, hinted that this new Ministry of Truth was designed specifically to target The Gateway Pundit correspondent Jordan Conradson for “trying to listen in” on Fake News reporters’ conversations and asking questions that “intimidate public officials.”

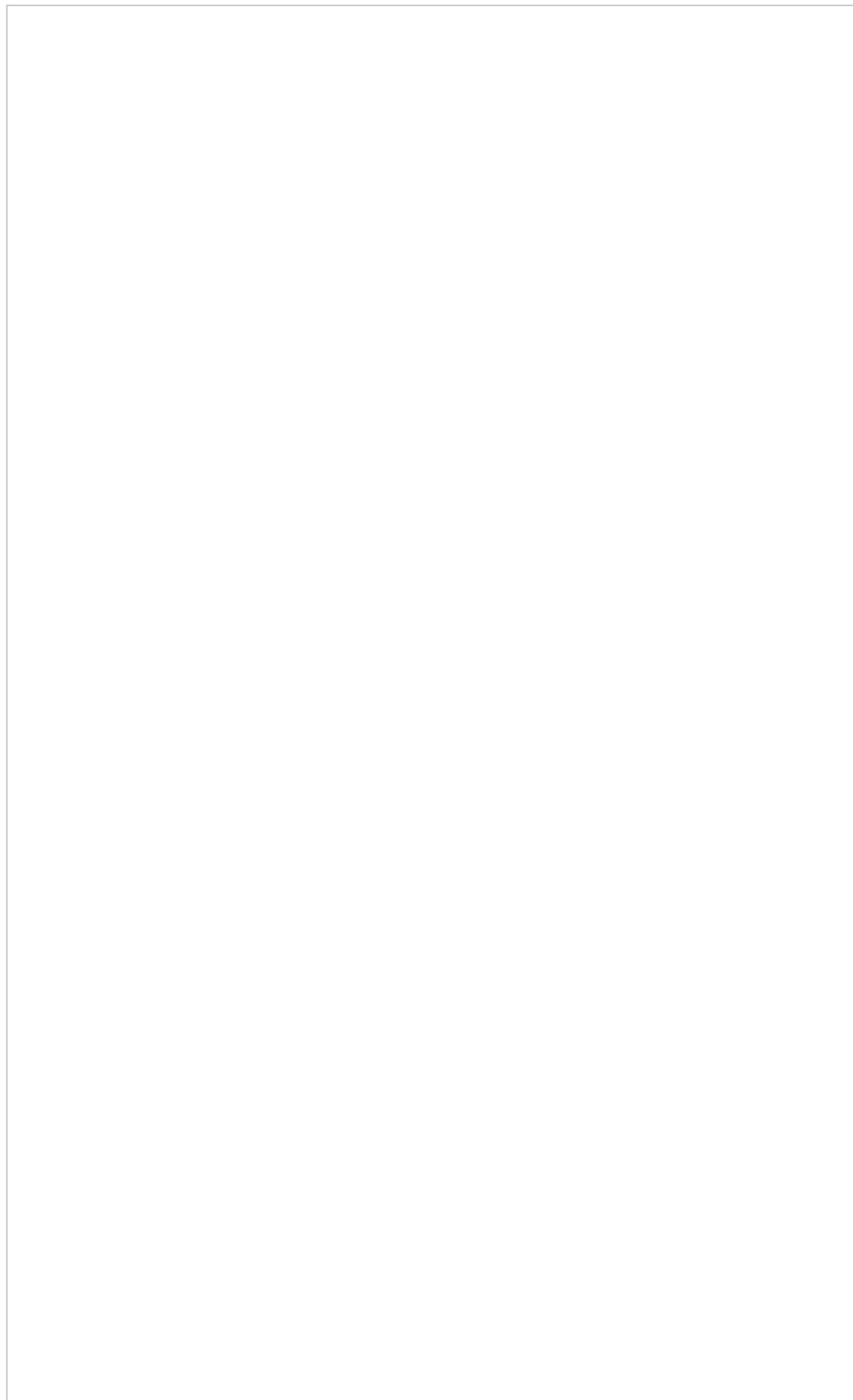
x

This is because of the incredibly botched 2022 Primary Election in Maricopa County. The Gateway Pundit previously **reported** on the election day incompetence in Maricopa County, where Republican voters were turned away from the polls due to printer malfunctions and ballots not being available while facing other issues stemming from the County’s shady felt-tipped pen recommendation.

We also **reported that 145 more Democratic activists than Republicans were hired by the RINO-controlled County to watch the polls, which is likely illegal.**

BREAKING: Maricopa County Election Day Incompetence - PRINTERS NOT WORKING, Voters Told They’ve ALREADY VOTED, Polling Locations Not Seen On AZSOS Webpage - UPDATES

They truly are intimidated by our real questions.



Abe Hamadeh's War Room account came to our defense and declared they "proudly stand in journalistic solidarity" with The Gateway Pundit correspondent Jordan Conradson and The Western Journal's Olivia Brown.

@CraigHarrisUSAT · [Follow](#)

Replying to @AbeWarRoom and @JenAFifield

Nope. Pretty common process. Gov. [@DougDucey](#), for example, only allows accredited, legitimate media members to attend certain briefings, and the [@Suns](#) don't let any random bloggers or self-proclaimed media members attend practices or have locker room access.

Abe Hamadeh War Room

@AbeWarRoom · [Follow](#)

Sure, [@CraigHarrisUSAT](#).

We're sure this process won't be used to shut out any form of dissenting media.

And if it is, we're sure you'll proudly stand in journalistic solidarity with people like [@ConradsonJordan](#) & [@oliviaintheusa](#), who refuse to walk the party line.

4:18 PM · Sep 27, 2022



9



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Stephen Richer also boasted about the County's suppression of The Gateway Pundit, and grassroots activist Merissa Hamilton slammed his Orwellian tactics.

Stephen Richer—Maricopa Cnty Recorder (prsnl ac...) · Sep 2

@stephen_richer · [Follow](#)

Watch on Twitter

GIF

Jen Fifield · [@JenAFifield](#)

County elections getting all fancy. Really gonna miss The Gateway Pundit rolling in and trying to listen in on legitimate reporter conversations/intimidate public officials.

Merissa Hamilton 

@merissahamilton · [Follow](#)

How very 1984 of [@maricopacounty](#) to create a Ministry of Truth policy

5:07 PM · Sep 27, 2022



20



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Kelli Ward slammed Maricopa County for discriminating against the free press on Twitter.

Dr. Kelli Ward 

@kelliwardaz · [Follow](#)

Maricopa County discriminating against the free press. How quaint. [#1A](#)

Jen Fifield  @JenAFifield

County elections getting all fancy. Really gonna miss The Gateway Pundit rolling in and trying to listen in on legitimate reporter conversations/intimidate public officials.



3:43 PM · Sep 27, 2022

 47  Reply  Copy link
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This all comes after former Maricopa County Supervisor Steve Chucri resigned because The Gateway Pundit released undercover audio tapes where he admits that he does not feel comfortable with Dominion Voting Machines and that County Recorder Stephen Richer agreed with him.

BREAKING – LEAKED AUDIO: Maricopa County Supervisor Steve Chucri Admits: “I DON’T FEEL COMFORTABLE WITH DOMINION” – And County Recorder Stephen Richer AGREES!

The same leftist news organizations promulgating conspiracy theories about “Russian collusion” in the 2016 Presidential Election will be allowed in, but likely not The Gateway Pundit and other conservative truth-telling outlets.

Contact Maricopa County now to demand free and fair press coverage during the 2022 Election.

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Jordan Conradson

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Exhibit 8

Article: “EXCLUSIVE: Former Maricopa County Recorder Steve Chucri Full January Phone Call With We The People AZ Alliance: “I Think It Was DONE Through Dead People Voting; I Think It Was Multifaceted” (AUDIO)”

The Gateway Pundit
December 4, 2021

EXCLUSIVE: Former Maricopa County Recorder Steve Chucri Full January Phone Call With We The People AZ Alliance: “I Think It Was DONE Through Dead People Voting; I Think It Was Multifaceted” (AUDIO)

By Jordan Conradson

Published December 4, 2021 at 7:45am

219 Comments



Former Maricopa County Supervisor Steve Chucri (left) Supervisor Bill Gates (right)

In September, The Gateway Pundit broke segments of undercover audio recordings featuring former Maricopa County Supervisor Steve Chucri revealing his true feelings about the 2020 Presidential Election, Dominion, and a full forensic audit of Maricopa County’s 2020 election.

Chucri was busted on record, saying exactly what we have been reporting for a year now and he revealed the real reason that his colleagues were opposed to an audit: They were scared!

EXCLUSIVE: Maricopa County Supervisor Steve Chucri In Leaked Recording on Fellow Supervisor: Hickman “Just Didn’t Have The Guts” - LIED To Stonewall A REAL Audit (AUDIO)



ER0344

Just one day after TGP began to break this news, Steve Chucri resigned from office in shame and embarrassment, and he completely flopped on his prior statements.

x

On Friday the Board of Supervisors **interviewed** seven applicants to fill Chucri's vacancy on the board.

BREAKING: Maricopa County Supervisor Steve Chucri RESIGNS From Office After TGP Exposé : "There Was No Cover-Up, The Election Was Not Stolen. Biden Won."

The Arizona Senate and CyberNinjas' audit concluded over **700,000** ballot discrepancies, extremely high adjudication rates, loose signature verification, and videographic evidence of individuals deleting elections records before the 22-month statutory deadline. In other words, the election never should have been certified.

Joe Biden was declared the winner of Arizona by less than 10,500 votes.

It has now been 70 days since these results were presented to the Nation and Arizona Attorney General Mark Brnovich.

Arizona Election Fraud: 2 Months After They Were Identified Illegally Deleting 2020 Election Records, Three Individuals Remain Unpunished, Unidentified and Uncharged by AG Mark Brnovich

Since receiving the "gift of an audit", a formal criminal investigation has been opened but we have seen no action.

The audio recording from January gives more background on Chucri's understanding of voters' election integrity concerns, Chucri's concerns with Dominion, and his fight with his colleagues and lawyers, which cost him a leadership position on the board.

In January, Steve Chucri was pro-audit, pro-transparency, and pro-accountability. He knew that Dominion Voting Machines were questionable and he knew that his constituents wanted answers.

Chucri voted against defying the Arizona Senate's subpoenas and as a result, he lost his opportunity to chair the board as Vice Chairman. He

told Steve Robinson and Shelby Busch that he was extremely “disappointed” in his colleagues for their staunch opposition to a joint audit of the 2020 election.

x

He then told Steve and Sheby in January, “I am persona non grata right now with my colleagues. I was passed over... because of my opposition to this.”

They chose Bill Gates, who Chucuri later asserted “has the backbone of a plastic fork”, to lead the board as Vice Chairman.

It appears that Bill Gates was chosen for this position either because he was involved in the election debacle, or he was scared that he lost, as Steve Chucuri said in March.

It is evident Chucuri held beliefs that the Board of Supervisors was scared to do a real audit since January, which he later confirms in March when he stated that his colleagues “got scared” because they won by very slim margins.

In January, Chucuri states, “I don’t know how tough my colleagues will be on making sure we have certain things looked into... this can’t be window dressing. It’s got to be a real audit.”

As Chucuri then said, in reference to his colleagues, “They just want to follow the gospel truth of whatever legal counsel is telling them.” This would make sense if you were committing a crime but they owe constituents accountability and transparency.

January 22nd Phone Call

1:49 Chucuri: As it relates to acquiring the Dominion software, at the time we did we weren’t aware of what happened in Texas. Or else I would have given serious pause to that. I don’t even think we can use this... in 2022. Too much damage has been done by way of perception of it.

2:45 Chucuri: I’m incredibly frustrated, I’m the most disappointed I’ve ever been with my colleagues in the eight years I’ve been in office that they wanted to fight this and now they’re finally coming around after two months.

4:08 Chucri: Claims Merissa Hamilton's Dominion RFP (vetting process) analysis was "flat out wrong"

4:40 Chucri: "The biggest regret is, we found out after the fact that we had already agreed to go with them, that's when we found out about Texas it was too late. "

6:05 Chucri: Elections Director Scott Jarrett, Adrian Fontes (later referred to as a scumbag, Stephen Richer ran a campaign on Fontes' criminal actions), and Jesse Moore chose Dominion Voting Machines

8:35: Chucri: "I'm all about transparency. This was a screw up. We should have known about what happened in Texas. I knew about Soros owning some other kind of software. Do you remember some other kind of tabulation? people were warning me about that." (Smartmatic) So two years ago when I told my constituents, I'm going to do everything in my power to take back elections and our authority **from Adrian Fontes when he screwed up in 2018**, never in a million years would I have thought I'd see this. And that's when the Soros issue came up but I never connected Smartmatic to Dominion. But I can tell you right now that I just think so much damage has been done with Dominion in voter confidence. And I'm taking about, you know **people are trying to say this is the far right, these are just the Trumpers... No it's not. This is middle of the road Republicans too like my mother, who's 82 years old. She's like, "honey I don't trust voting anymore." My mom said that, 82-year-old mother, my contractor building the house for me same thing. I've had Democrats write me and say they don't have confidence, they don't like this Dominion.** I think we have to do this audit to see what happened or didn't happen but I gotta tell you something, **I don't know if I have confidence to be able to use this software in 2022. I told that to my colleagues.**

11:22 Chucri: "What I like about this is the fact that we are going to work with Senator Fann and others, so it's not just going to be us. This is going to be a joint effort and I'm embarrassed to say that my colleagues were challenging the legislature on the subpoenas. If we could do this in a joint venture and talk to warren Peterson and Karen Fann and say we're demanding this, **because I don't know how tough my colleagues will be on making sure we have certain things looked into and I want to make**

sure we have a lot of things looked into. this can't be window dressing. It's got to be a real audit."

12:09 Shelby Busch: Who is making the final decision on who does the audit? Is it a joint decision between the BOS and the Senate or does one hold the authority over the other?

12:25 Chucuri: Shelby, what I understand right now, and you have to remember something. **I am persona non grata right now with my colleagues. I was passed over; I was supposed to be vice chairman. They chose Mr. Gates because of my opposition to this.** Now, they're not saying that's why. They're just saying they thought I was really busy, and I couldn't do both which is horse sh*t. But they passed over me because of my position on this. **So, you got to remember there's a lot of politics at play, so I didn't get all the information... What I'm going to be pushing is that we do a joint audit and we work together on this, and we compile a laundry list of things we're going to check...** My effort would be to have us do it jointly because that way I think we can have more done vs. just, because remember I want a laundry list of stuff done. **My colleagues might say were only doing A through B when I want A through F or longer. I think that doing it in a joint intentional effort with the legislature, we'll have a better audit.** I'll know more on Monday and that's what I'm going to push for, that we do it together and we both agree on the scope of the work.

14:30 Chucuri: I have never been this disappointed in my colleagues, I've never been this disappointed. Like I told you earlier, it shouldn't be this hard. **But, do you agree with me that there is no way we can use Dominion? Even if this audit comes back clear, in two years, that we have to start anew?**

16:20 Shelby Busch: notifies Chucuri that Micharl Fonteras signed the contract with Dominion Voting Machines. "He has been implicated in multiple states for accessing tabulation systems inside of the Recorder's office and having miraculous shifts in votes. Used to be on the election integrity committee for Denver Colorado. He brought in Soros' Smartmatic, and Denver had the most disastrous election in U.S. history. And then he went on to work for Dominion. And he's the man that signed the contract with you guys. These are the things that we as investigative citizens, we see these things and then we look at our Board of Supervisors, our Senate

and these various people. **And we say, how can we as citizens, spending such little time out of our lives know these things when the people we elect to represent us don't? And that's where things get a little messy right?"**

17:30 Chucri: 100%

17:50 Chucri: **What legal counsel said, is that we can't push this while were in litigation, which I think is BS.** I told them I think it's BS. And that's why I voted against it and between the 4 of us, I challenged our legal counsel to where we were yelling at each other. **You know who's really understanding this? Stephen richer you should have a conversation with Steven richer. He'll verify everything I'm telling you. He's already frustrated and he's only been in office 5 days.** They're gloving on. Some folks always want to be right or they make it about themselves and that's what my colleagues are doing unfortunately. Instead of making the decision for themselves, they just want to follow the gospel truth of what legal counsel is telling them. And I just don't understand it. I'm telling you the honest to God truth, that's it. And they want to fight. They're mad that they were subpoenaed. I'm embarrassed that we had to be subpoenaed. I'm embarrassed, shame on us!

19:48 Chucri: "They want to fight and they want to be proven right, when I want to say, hey guys, yeah we might have pulled off an election by way of logistics but there's some questions and concerns about the software and we should look into it. Don't just try to defend something because we don't know if it's good or bad we're not techno geeks we don't know anything about this. So let's turn it over to professionals who did it, who have seen something. **And it's not just Arizona, it's Georgia, it was Michigan, it was all these other states, so it's not just like it was an isolated incident with no proof.** I think that's the answer **because I'll tell you what I question this.** If you remember about a month ago, actually Clint Hickman had 2 auditors come out here and I don't know if you guys heard this story. And I said, good let's get them going and **our legal counsel said no we still don't think we should.** And I said, why in the hell did we **spend money** to get 2 auditors out here and then **send them back?** That was a stupid ass decision. Clint Hickman and I have not had a personal conversation since then."

21:02 Busch: “You guys have already turned over quite a bit of evidence for review. And there’s a lot of evidence already in the hands of the senate and others for review. I’m unaware of that. Is that true and if so what was turned over?”

21:37 Chucuri: “We handed over some things... that they’ve asked for... but **it’s not an audit of the machines. You know? it’s not an audit of the machines. It would be like you asking me for some help. You need \$10,000 and I give you 200 bucks. That’s not helping you, that’s not helping you.**

22:17 Chucuri: (Col. Phil Waldron) “I like him a lot. He’s a great guy. I really like him... He’s a decent guy, 100%.”

26:17 Busch: “People are frustrated and they want real answers, and a softball audit is not going to satisfy the appetite of the frustrated, disenfranchised voters right now.”

22:17 Chucuri: “**No, I think we need a real audit to see what happened in this past election and then I think we need to find a different tabulation company for 2022.** I think that’s the best thing we can do for voter confidence.”

27:55 Chucuri: “**I think it was done through dead people voting I think it was multifaceted. I think there is a lot of clean-up we have to do... Ballot harvesting, ballot harvesting!**”

30:45 Chucuri: “You’ll hear me on Wednesday if it’s not on the agenda, you wait until the end of the meeting and I’ll say it, you’ll hear me loud and clear.”

30:55 Chucuri: “You know what I find really interesting? Is Hickman, who I asked for two freakin months to bring it up for a vote. And now he’s doing this apology tour bullshit. It pisses me off. He had every chance to do it. **And then they got mad at me for voting against going against the legislature on these subpoenas and going to court?** I just think that’s hypocrisy it really ticks me off”

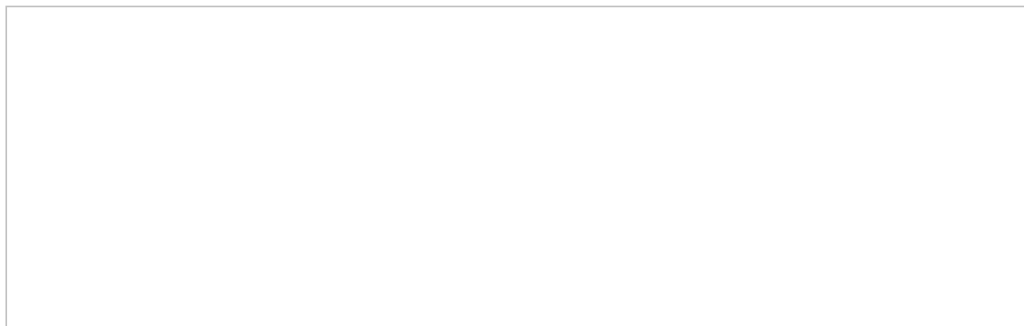
31:50 Chucuri: “**I do agree that I think this has to be looked at to make sure this election was not what some believe it is.** We have to get to the

bottom of whether or not this system is compromised, plain and simple. I think equally important and more important is for future elections for people to have the confidence in their vote. They will not have confidence in dominion software, even if we find nothing and it was perfect, the damage is already done to their reputation. **The damage is already done so I just don't think we can use it in 2022. And I don't see how I can support it... When it comes to ones right to vote, I don't care what it costs but I'm going to always spend what we need to spend to ensure that somebody's vote is counted."**

Why was legal counsel so opposed to an audit? Were they worried it might prove law violations?

Contact Arizona Attorney General Mark Brnovich now and demand a complete investigation and arrests for the treasonous officials who stole our voices.

Stay tuned for the March conversation.



Contact AG Mark Brnovich

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Jordan Conradson

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ER0353

Exhibit 9

Article: “MUST SEE VIDEO: Arizona
Secretary of State Katie Hobbs RUNS
From TGP’s Jordan Conradson
AGAIN— Won’t Answer Questions At
Free and Fair Elections Event”

The Gateway Pundit
March 23, 2022

MUST SEE VIDEO: Arizona Secretary of State Katie Hobbs RUNS From TGP's Jordan Conradson AGAIN – Won't Answer Questions At Free and Fair Elections Event

By [Jordan Conradson](#)

Published March 23, 2022 at 8:35pm

266 Comments



On Tuesday night, [Arizona Talks](#) hosted an event in Phoenix, Arizona, with guest speakers including radical leftist Arizona Secretary of State Katie Hobbs, RINO Maricopa County Recorder Stephen Richer, political operative turned fake news reporter Garrett Archer and Arizona State Senator Raquel Teran.

Maricopa County and Secretary of State Katie Hobbs are currently under [investigation](#) for the elections law violations and hundreds of thousands of ballot discrepancies discovered by the Maricopa County election audit.

They're all working together with nonprofits to cover up the rigged 2020 Presidential Election.

Like Maricopa County Supervisor Bill Gates, who recently appeared on a [John McCain Institute video seminar](#) with Soros-funded Michigan Secretary of State Jocelyn Benson, Stephen Richer is cooperating with Soros-funded Katie Hobbs to cover up the stolen 2020 election. Strange!



EXCLUSIVE: Maricopa County Supervisor Bill Gates Continues to Play Victim and Refuses to Turn Election Routers Over to Inspectors... Why Is That? (VIDEO)

Maricopa County Chairman Bill Gates, Michigan Secretary of State Jocelyn Benson, and Pasco County Supervisor Brian Corely recently chaired a McCain Institute panel titled, "Defending American Democracy: When Local Elections Are Threatened, What Are The National Implications?". The Gateway Pundit received this video from WeThePeopleAZAlliance. The video conference took place on March 3rd, 2022, the ... Continue reading

GP The Gateway Pundit

They are so desperate!

The mixer was sold as "an evening of guest speakers sharing their stories, expertise, and a myriad of views from across the political spectrum."

They all shared the same views on the rigged 2020 Presidential election, claiming it was the most secure election in history.

Local Patriot Liz Harris witnessed Katie Hobbs telling event staff about The Gateway Pundit correspondent Jordan Conradson before speakers took the stage. Organizers then double-checked the list for Conradson's name and saw that he was on the list.

The full [list](#) of speakers included,

- Stephen Richer, Maricopa County Recorder

- Dr. Heather Carter, Executive Vice President with Greater Phoenix Leadership
- Raquel Terán, Arizona State Senator for LD 30 (D)
- Mike Noble, Chief of Research & Managing Partner of OH Predictive Insights (OHPI)
- Garrett Archer, Data Analyst with ABC15
- Katie Hobbs, Arizona Secretary of State

Join us as we follow the raging debate on this crucial democratic process: holding elections and exercising the right to vote. How do we ensure that elections are both secure and inclusive? Should elections be more competitive, open, and less partisan? If so, what practices can be put in place to improve the quality of our elections to further our founders' aim of creating a more perfect union? Come hear from experts on ways to ensure free, fair, and secure elections.

The Issue

We have heard from the loudest sides. Some point to possible weaknesses in the elections system and even claim the existence of widespread voter fraud. Others see new restrictions on voting as partisan suppression of marginalized communities and even compare these tactics to the Jim Crow era. There are those who view the design of the electoral system as being flawed in favor of hyper-partisanship.

In a democracy, the government derives authority from the consent of the electorate. What can we do to maintain faith in our electoral process? Where should the balance between secure elections and voter access lie? Where does election integrity end and voter suppression begin? These are some of the most important questions that can be asked pertaining to this ongoing experiment that is our Republic.

Election thief Katie Hobbs, who is currently under investigation by the Arizona Attorney General for 2020 and 2022 elections law violations, read a scripted speech to the crowd.

After Hobbs called supporters of election integrity "Democracy deniers" and finished her speech, Conradson attempted to respectfully approach her.

Hobbs immediately started to run before Conradson could ask a single question.

In the video below, Conradson catches Katie Hobbs running from him and says,

Secretary Hobbs, Secretary Hobbs, Secretary Hobbs are you worried that the Attorney General will prosecute you?

Katie Hobbs ran inside the building, and another attendee stopped Conradson saying, “the Secretary of State just went inside.”

Minutes later, Conradson was removed from the event while next to Maricopa County Recorder Stephen Richer.

“You’re making one of our patrons very uncomfortable,” said the venue employee.

This same thing happened one year ago with Katie Hobbs. She is deeply disturbed by the truth coming out.

“Why Are You Working So Hard to Shut the Audit Down? What Are You Hiding” – TGP Reporter Confronts AZ Secretary of State Katie Hobbs – Katie Hobbs Runs! (VIDEO)

These people are terrified of real questions about the stolen 2020 election!

Submit a Correction



Jordan Conradson

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ER0360

Exhibit 10

Article “BREAKING: Maricopa
County’s Ministry of Truth BLOCKS
The Gateway Pundit Reporter Access
To 2022 Midterm Election Coverage
In County”

The Gateway Pundit
October 1, 2022

BREAKING: Maricopa County ‘s Ministry of Truth BLOCKS The Gateway Pundit Reporter Access To 2022 Midterm Election Coverage In County

By Jordan Conradson

Published October 1, 2022 at 8:00am

1017 Comments

Maricopa County has officially denied The Gateway Pundit a press credential to cover the 2022 General Elections.

The new email came days after The Gateway Pundit reported that Maricopa County has created its own Ministry of Truth or “Elections Command Center to Share Info with Voters, Combat Disinformation.”

BREAKING: Maricopa County Creates “Ministry Of Truth” To Silence The Gateway Pundit – Now Requiring Official Press Pass For Media “To ENTER ITS FACILITIES And/Or Cover Events Related To The 2022 General Election”

“Maricopa County will require an official Press Pass for members of the press to enter its facilities and/or cover events related to the 2022 General Election,” **stated** a new order from the County, allowing them to hand-pick who gets to cover their (s)election.

They are so terrified of The Gateway Pundit that they blocked us from covering the 2022 elections.

The Gateway Pundit received an email from the County stating, “You (a) do not avoid real or perceived conflicts of interest and (b) are not free of associations that would compromise journalistic integrity or damage credibility. Therefore, you are not a bona fide correspondent of repute in your profession.”

The Gateway Pundit correspondent Jordan Conradson received the following email from CAOMedia@maricopa.gov last night.

Dear Mr. Conradson,



ER0362

Thank you for applying for a Maricopa County Press Pass. This email is to notify you that you have been **denied** a press credential based on the following criteria which is listed on Maricopa.gov:

- **#4: You (a) do not avoid real or perceived conflicts of interest and (b) are not free of associations that would compromise journalistic integrity or damage credibility. Therefore, you are not a bona fide correspondent of repute in your profession.**

If you would like to appeal this decision, please reply to this email stating the reasons it should be reconsidered.

Further, any press conference about the 2022 Election will be streamed to a Maricopa County YouTube channel and you are welcome to view it.

Thank you,

Elections Command Center

Seriously?

This is likely because Conradson reports the truth, like when we released information so damning that it led to the **resignation** of Maricopa County Supervisor Steve Chucri. Chucri **admitted**, “I don’t feel comfortable with Dominion [Voting Machines],” and that Maricopa County Recorder Stephen Richer agrees with him.

Chucri also **admitted** that he believed there was “multifaceted” voter fraud that occurred through ballot harvesting and dead voters.

BREAKING - LEAKED AUDIO: Maricopa County Supervisor Steve Chucri Admits: “I DON’T FEEL COMFORTABLE WITH DOMINION” - And County Recorder Stephen Richer AGREES!

This also comes after the incredibly botched 2022 Primary Election in Maricopa County. The Gateway Pundit previously **reported** on the election day incompetence in Maricopa County, where Republican voters were turned away from the polls after being told they’ve already voted and facing printer malfunctions which led to ballots not being available. We also **reported** on



other issues stemming from the County's shady felt-tipped pen recommendation.

x

And it comes after corrupt Maricopa County Supervisor Bill Gates – who former Supervisor Steve Chucri said was **scared of a 2020 election audit** “because he barely won” – **said** the election of Trump-Endorsed candidates in the Primary was a “catastrophe” for Democracy and “I think they are electable, which is frightening,” all while suggesting that the GOP must lose or face “humiliation at the ballot box.”

“What may have to happen is that we lose elections,” said Bill Gates.

Elections officials in Arizona are openly rooting against Trump Republicans, and who knows what they'll do to make sure they don't win?

Gates is just terrified because Trump-endorsed candidates will get to the bottom of 2020.

We have even reported on footage of individuals **illegally deleting** 2020 election files from the Elections Management Server in April 2021.

And **much more.**

What about the far-left Fake Newspapers that are desperately trying to control the narrative surrounding Maricopa County's elections?

What about the reporters from these organizations who have real AND perceived “conflicts of interest” or biases? Will they be allowed to cover the 2022 election?

Will Far-Left Hack Jen Fifield from the lying Arizona Republic, who did **everything she could** to compromise the integrity of the Maricopa County full forensic audit – which found **hundreds of thousands** of potentially fraudulent or illegal ballots – be awarded a press credential?

She probably deserves it after Save America Attorney Christina Bobb decimated her in an argument that Fifield started last year when she got WRECKED by Vernon Jones at the audit facility. Someone should give this woman a bandaid with her press pass.

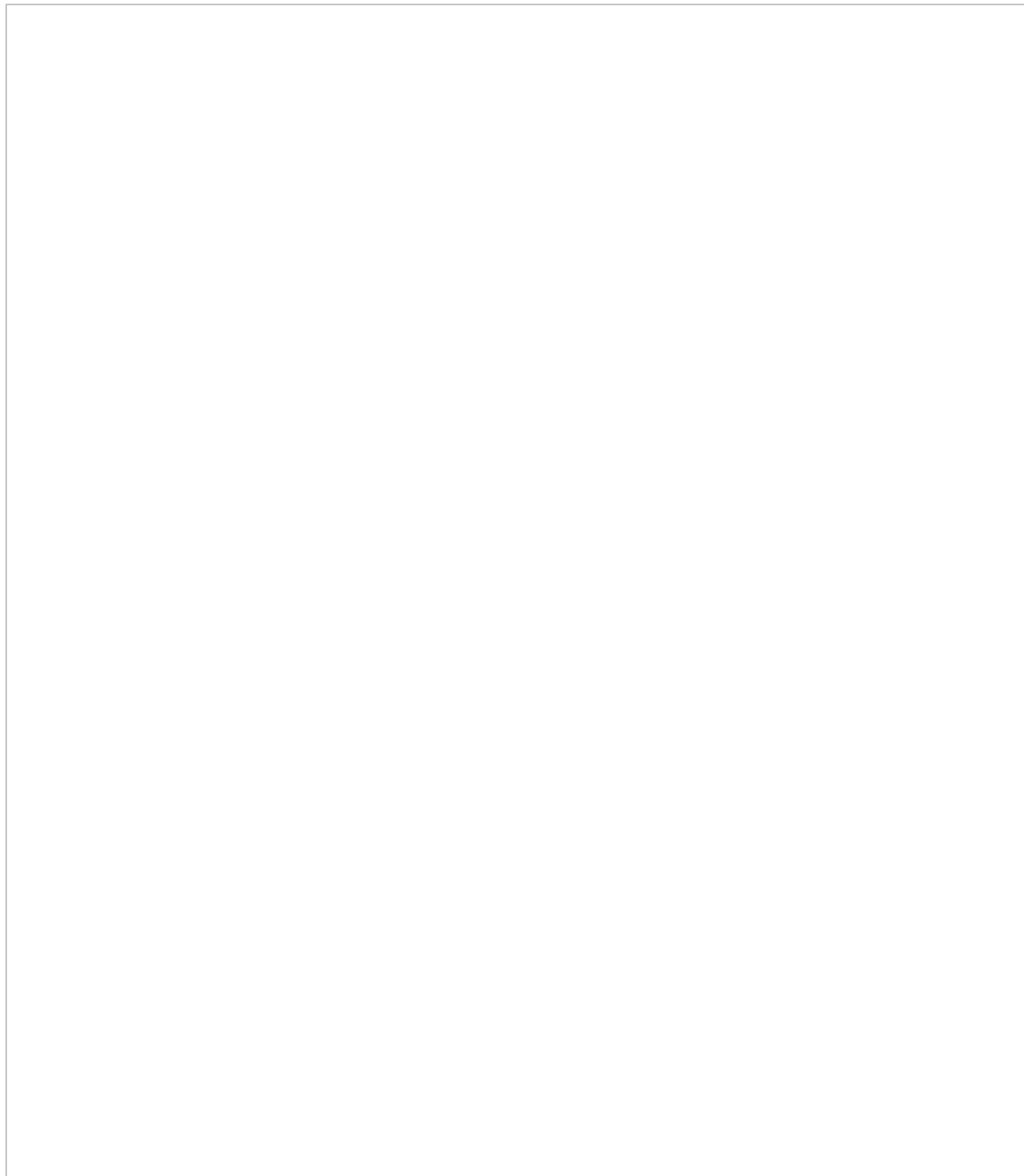
“You’re Upset About This?? I REALLY Don’t Care!” – EPIC: Christina Bobb REFUSES To Take Leftist Reporter’s BS in Arizona

x

What about Far-Left Hack Stacey “Karen” Barchenger, also from the Arizona Republic, who is such a poor and biased journalist that she didn’t even air an **interview with Kari Lake** because it went against her narrative? Will she be allowed a press credential?

We **reported** on this interview too. It was embarrassing, to say the least.

Will leftist **anti-America** Hack Brahm “Beta Male” Resnik, who **almost got sued** for calling Congressman Paul Gosar a “white nationalist” and calls everybody that he disagrees with Nazis or white supremacists/nationalists, **including the Arizona GOP**, receive a credential?



Resnik compares AZGOP to Nazis



ER0365

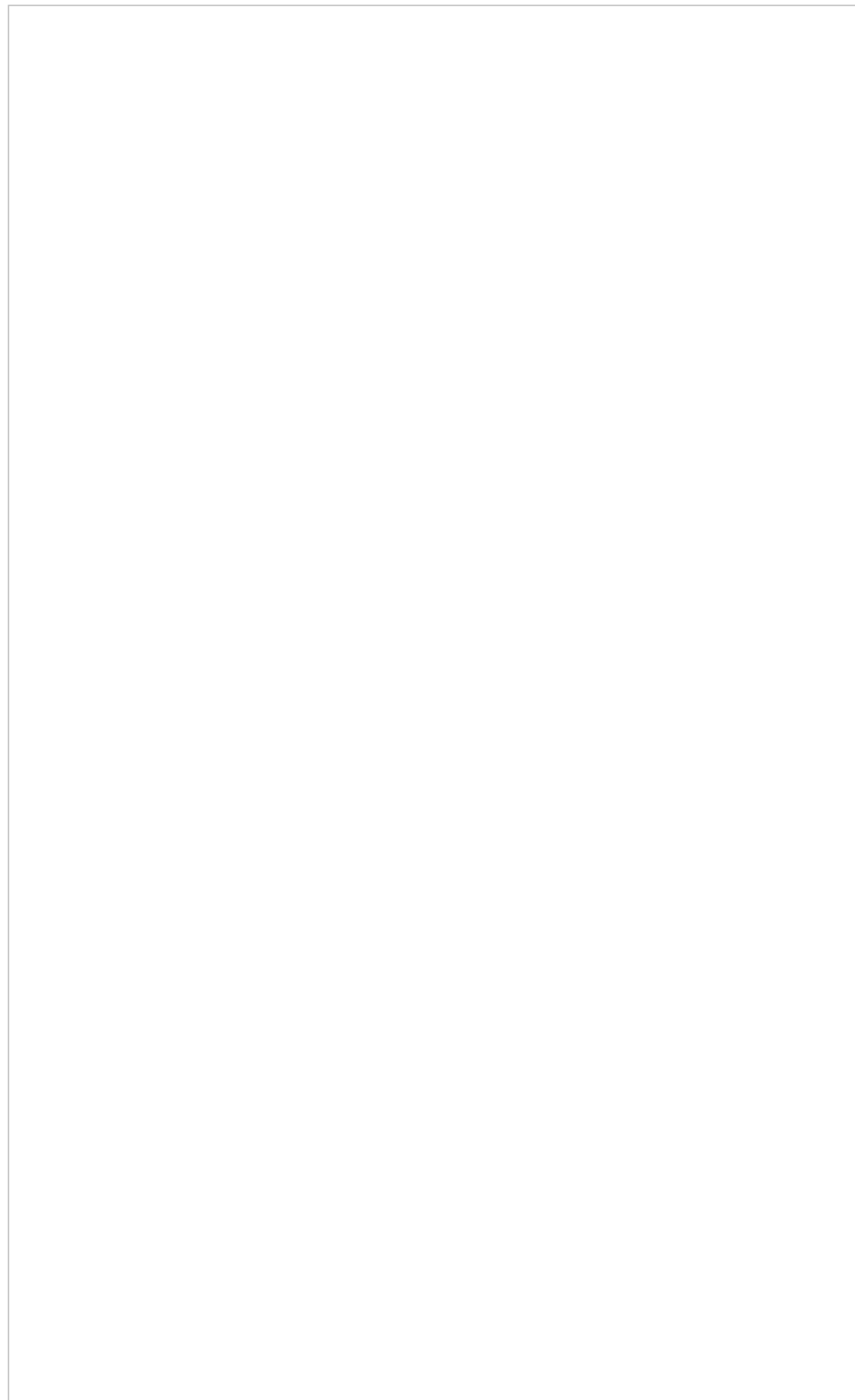
What about Far-left Arizona Mirror's Dillon Rosenblatt? Oh, that's right, he got fired after Trump-Endorsed Senate Candidate Blake Masters **exposed** his racist, sexist, homophobic tweets. LOL.

x

Are these the "bona fide correspondents" that the County is looking for?

The Gateway Pundit likely has more readers than all of these frauds combined. The Gateway Pundit had **nearly one BILLION** pageviews in 2021 despite Twitter banning our account in, Facebook eliminating 95% of our traffic, T-Mobile blocking our content, powerful leftist organizations targeting us, and Google smearing us and blocking traffic to our website. This is because we report the TRUTH.

Jen Fifield, who previously hinted that the Maricopa County Ministry of Truth was created to target The Gateway Pundit, again accused us of "intimidating journalists and public officials."



Finally, she got something right. They are extremely intimidated by our questions about the Fraudulent 2020 Election, the shady 2022 Primary Election, and the already corrupt 2022 General Election.



This is a violation of our First Amendment.

X

They don't want The Gateway Pundit reporting on the election only because we don't carry water for corrupted politicians and election officials.

We have a record of exposing shady politicians and fraudulent elections.

What are they hiding?

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UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

TGP Communications, LLC, *et al.*,

Plaintiffs,

v.

Jack Sellers, *et al.*,

Defendants.

Case No. 2:22-cv-01925-JJT

**DECLARATION OF
CASSIDY S. CURRAN**

I, Cassidy S. Curran, hereby declare:

1. I am over 18 years of age and have never been convicted of a crime involving fraud or dishonesty. I have knowledge of the facts set forth herein, and if called as a witness, could and would testify thereto.

2. I am a Paralegal employed at the law firm of Randazza Legal Group, PLLC (“RLG”), counsel for Plaintiffs in the above-captioned matter.

3. I submit this declaration in support of Plaintiffs’ Notice of Filing Exhibits in Support of Emergency *Ex Parte* Motion for Temporary Restraining Order and Request for Judicial Notice (the “Notice”).

4. On November 15, 2022, at 7:08 p.m. eastern time, while at the Massachusetts office of RLG and using the Google Chrome browser on a MacBook Air laptop, I visited the *Gateway Pundit* article titled ““Why Are You Working So Hard to Shut the Audit Down? What Are You Hiding” – TGP Reporter Confronts AZ Secretary of State Katie Hobbs — Katie Hobbs Runs! (VIDEO)” at the URL: <https://www.thegatewaypundit.com/2021/05/working-hard-shut-audit-hiding-tgp-reporter-confronts-az-secretary-state-katie-hobbs-katie-hobbs-runs-video/>. Immediately

1 after visiting this page, I created a printout of it using the Chrome browser's "print to PDF"
2 function. A true and correct copy of this printout is attached to the Notice as **Exhibit 1**.

3 5. On November 15, 2022, at 7:17 p.m. eastern time, while at the Massachusetts
4 office of RLG and using the Google Chrome browser on a MacBook Air laptop, I visited
5 the *Gateway Pundit* article titled "EXCLUSIVE... Maricopa County Supervisor Steve
6 Chucuri Caught in Leaked Recording: The Maricopa County Voting Machine Company
7 Audit and Recount – "Was Pretty BULLSH*T By The Way" (AUDIO)" at the URL:
8 [https://www.thegatewaypundit.com/2021/09/exclusive-maricopa-county-supervisor-](https://www.thegatewaypundit.com/2021/09/exclusive-maricopa-county-supervisor-steve-chucuri-caught-leaked-recording-maricopa-county-voting-machine-company-audit-recount-pretty-bullsht-way-audio/)
9 [steve-chucuri-caught-leaked-recording-maricopa-county-voting-machine-company-audit-](https://www.thegatewaypundit.com/2021/09/exclusive-maricopa-county-supervisor-steve-chucuri-caught-leaked-recording-maricopa-county-voting-machine-company-audit-recount-pretty-bullsht-way-audio/)
10 [recount-pretty-bullsht-way-audio/](https://www.thegatewaypundit.com/2021/09/exclusive-maricopa-county-supervisor-steve-chucuri-caught-leaked-recording-maricopa-county-voting-machine-company-audit-recount-pretty-bullsht-way-audio/). Immediately after visiting this page, I created a printout
11 of it using the Chrome browser's "print to PDF" function. A true and correct copy of this
12 printout is attached to the Notice as **Exhibit 2**.

13 6. On November 15, 2022, at 7:12 p.m. eastern time, while at the Massachusetts
14 office of RLG and using the Google Chrome browser on a MacBook Air laptop, I visited
15 the *Gateway Pundit* article titled "EXCLUSIVE: Maricopa County Supervisor Steve
16 Chucuri on 2020 Election in Leaked Recording: "I Think It Was Done Through DEAD
17 PEOPLE Voting. I Think IT WAS MULTIFACETED – BALLOT HARVESTING"
18 (AUDIO)" at the URL: [https://www.thegatewaypundit.com/2021/09/exclusive-maricopa-](https://www.thegatewaypundit.com/2021/09/exclusive-maricopa-county-supervisor-steve-chucuri-2020-election-leaked-recording-think-done-dead-people-voting-think-multifaceted-ballot-harvesting-audio/)
19 [county-supervisor-steve-chucuri-2020-election-leaked-recording-think-done-dead-people-](https://www.thegatewaypundit.com/2021/09/exclusive-maricopa-county-supervisor-steve-chucuri-2020-election-leaked-recording-think-done-dead-people-voting-think-multifaceted-ballot-harvesting-audio/)
20 [voting-think-multifaceted-ballot-harvesting-audio/](https://www.thegatewaypundit.com/2021/09/exclusive-maricopa-county-supervisor-steve-chucuri-2020-election-leaked-recording-think-done-dead-people-voting-think-multifaceted-ballot-harvesting-audio/). Immediately after visiting this page, I
21 created a printout of it using the Chrome browser's "print to PDF" function. A true and
22 correct copy of this printout is attached to the Notice as **Exhibit 3**.

23 7. On November 15, 2022, at 7:12 p.m. eastern time, while at the Massachusetts
24 office of RLG and using the Google Chrome browser on a MacBook Air laptop, I visited
25

1 the *Gateway Pundit* article titled “BREAKING: Maricopa County Supervisor Steve Chucri
2 RESIGNS From Office After TGP Exposé: “There Was No Cover-Up, The Election Was
3 Not Stolen. Biden Won.”” at the URL:
4 [https://www.thegatewaypundit.com/2021/09/maricopa-county-supervisor-steve-chucri-](https://www.thegatewaypundit.com/2021/09/maricopa-county-supervisor-steve-chucri-resigns-office-tgp-expose-no-cover-election-not-stolen-biden-won/)
5 [resigns-office-tgp-expose-no-cover-election-not-stolen-biden-won/](https://www.thegatewaypundit.com/2021/09/maricopa-county-supervisor-steve-chucri-resigns-office-tgp-expose-no-cover-election-not-stolen-biden-won/). Immediately after
6 visiting this page, I created a printout of it using the Chrome browser’s “print to PDF”
7 function. A true and correct copy of this printout is attached to the Notice as **Exhibit 4**.

8 8. On November 15, 2022, at 7:12 p.m. eastern time, while at the Massachusetts
9 office of RLG and using the Google Chrome browser on a MacBook Air laptop, I visited
10 the *Gateway Pundit* article titled “BREAKING: County Supervisor Steve Chucri Leaked
11 Audio: “I’ve Had DEMOCRATS Telling Me They Don’t Have Confidence, They Don’t
12 Like DOMINION – Why In The World Would Governor Ducey Really Say No To
13 Giuliani?”” at the URL: [https://www.thegatewaypundit.com/2021/09/breaking-county-](https://www.thegatewaypundit.com/2021/09/breaking-county-supervisor-steve-chucri-leaked-audio-democrats-telling-dont-confidence-dont-like-dominion-world-governor-ducey-really-say-no/)
14 [supervisor-steve-chucri-leaked-audio-democrats-telling-dont-confidence-dont-like-](https://www.thegatewaypundit.com/2021/09/breaking-county-supervisor-steve-chucri-leaked-audio-democrats-telling-dont-confidence-dont-like-dominion-world-governor-ducey-really-say-no/)
15 [dominion-world-governor-ducey-really-say-no/](https://www.thegatewaypundit.com/2021/09/breaking-county-supervisor-steve-chucri-leaked-audio-democrats-telling-dont-confidence-dont-like-dominion-world-governor-ducey-really-say-no/). Immediately after visiting this page, I
16 created a printout of it using the Chrome browser’s “print to PDF” function. A true and
17 correct copy of this printout is attached to the Notice as **Exhibit 5**.

18 9. On November 15, 2022, at 7:11 p.m. eastern time, while at the Massachusetts
19 office of RLG and using the Google Chrome browser on a MacBook Air laptop, I visited
20 the *Gateway Pundit* article titled “Leaked Audio... Maricopa County Supervisor Steve
21 Chucri: “Dominion, Whether They’re Right or Wrong... The Damage Is Done”” at the
22 URL: [https://www.thegatewaypundit.com/2021/09/leaked-audio-maricopa-county-](https://www.thegatewaypundit.com/2021/09/leaked-audio-maricopa-county-supervisor-steve-chucri-dominion-whether-right-wrong-damage-done/)
23 [supervisor-steve-chucri-dominion-whether-right-wrong-damage-done/](https://www.thegatewaypundit.com/2021/09/leaked-audio-maricopa-county-supervisor-steve-chucri-dominion-whether-right-wrong-damage-done/). Immediately after
24
25

1 visiting this page, I created a printout of it using the Chrome browser's "print to PDF"
2 function. A true and correct copy of this printout is attached to the Notice as **Exhibit 6**.

3 10. On November 15, 2022, at 7:11 p.m. eastern time, while at the Massachusetts
4 office of RLG and using the Google Chrome browser on a MacBook Air laptop, I visited
5 the *Gateway Pundit* article titled "BREAKING: Maricopa County Creates "Ministry Of
6 Truth" To Silence The Gateway Pundit – Now Requiring Official Press Pass For Media
7 "To ENTER ITS FACILITIES And/Or Cover Events Related To The 2022 General
8 Election"" at the URL: [https://www.thegatewaypundit.com/2022/09/breaking-maricopa-](https://www.thegatewaypundit.com/2022/09/breaking-maricopa-county-creates-ministry-truth-silence-gateway-pundit-now-requiring-official-press-pass-media-enter-facilities-cover-events-related-2022-ge/)
9 [county-creates-ministry-truth-silence-gateway-pundit-now-requiring-official-press-pass-](https://www.thegatewaypundit.com/2022/09/breaking-maricopa-county-creates-ministry-truth-silence-gateway-pundit-now-requiring-official-press-pass-media-enter-facilities-cover-events-related-2022-ge/)
10 [media-enter-facilities-cover-events-related-2022-ge/](https://www.thegatewaypundit.com/2022/09/breaking-maricopa-county-creates-ministry-truth-silence-gateway-pundit-now-requiring-official-press-pass-media-enter-facilities-cover-events-related-2022-ge/). Immediately after visiting this page,
11 I created a printout of it using the Chrome browser's "print to PDF" function. A true and
12 correct copy of this printout is attached to the Notice as **Exhibit 7**.

13 11. On November 15, 2022, at 7:11 p.m. eastern time, while at the Massachusetts
14 office of RLG and using the Google Chrome browser on a MacBook Air laptop, I visited
15 the *Gateway Pundit* article titled "EXCLUSIVE: Former Maricopa County Recorder Steve
16 Chucri Full January Phone Call With We The People AZ Alliance: "I Think It Was DONE
17 Through Dead People Voting; I Think It Was Multifaceted" (AUDIO)" at the URL:
18 [https://www.thegatewaypundit.com/2021/12/exclusive-former-maricopa-county-recorder-steve-](https://www.thegatewaypundit.com/2021/12/exclusive-former-maricopa-county-recorder-steve-chucri-full-january-phone-call-people-az-alliance-think-done-dead-people-voting-think-multifaceted/)
19 [chucri-full-january-phone-call-people-az-alliance-think-done-dead-people-voting-think-](https://www.thegatewaypundit.com/2021/12/exclusive-former-maricopa-county-recorder-steve-chucri-full-january-phone-call-people-az-alliance-think-done-dead-people-voting-think-multifaceted/)
20 [multifaceted/](https://www.thegatewaypundit.com/2021/12/exclusive-former-maricopa-county-recorder-steve-chucri-full-january-phone-call-people-az-alliance-think-done-dead-people-voting-think-multifaceted/). Immediately after visiting this page, I created a printout of it using the
21 Chrome browser's "print to PDF" function. A true and correct copy of this printout is
22 attached to the Notice as **Exhibit 8**.


23 12. On November 15, 2022, at 7:09 p.m. eastern time, while at the Massachusetts
24 office of RLG and using the Google Chrome browser on a MacBook Air laptop, I visited
25

the *Gateway Pundit* article titled “MUST SEE VIDEO: Arizona Secretary of State Katie Hobbs RUNS From TGP’s Jordan Conradson AGAIN — Won’t Answer Questions At Free and Fair Elections Event” at the URL: <https://www.thegatewaypundit.com/2022/03/must-see-video-arizona-secretary-state-katie-hobbs-runs-tgps-jordan-conradson-wont-answer-questions-free-fair-elections-event/>. Immediately after visiting this page, I created a printout of it using the Chrome browser’s “print to PDF” function. A true and correct copy of this printout is attached to the Notice as **Exhibit 9**.

13. On November 15, 2022, at 7:11 p.m. eastern time, while at the Massachusetts office of RLG and using the Google Chrome browser on a MacBook Air laptop, I visited the *Gateway Pundit* article titled “BREAKING: Maricopa County ‘s Ministry of Truth BLOCKS The Gateway Pundit Reporter Access To 2022 Midterm Election Coverage In County” at the URL: <https://www.thegatewaypundit.com/2022/10/breaking-not-bona-fide-correspondent-maricopa-county-s-ministry-truth-blocks-gateway-pundit-reporter-access-2022-election-coverage-maricopa-county/>. Immediately after visiting this page, I created a printout of it using the Chrome browser’s “print to PDF” function. A true and correct copy of this printout is attached to the Notice as **Exhibit 10**.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: November 15, 2022.


Cassidy S. Curran

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6 **IN THE UNITED STATES DISTRICT COURT**
7 **FOR THE DISTRICT OF ARIZONA**
8

9 TGP Communications LLC, *et al.*,

10 Plaintiffs,

11 v.

12 Jack Sellers, *et al.*,

13 Defendants.
14

No. CV-22-01925-PHX-JJT

ORDER

15 At issue is Plaintiff's Corrected Emergency *Ex Parte* Motion for a Temporary
16 Restraining Order (Doc. 7). Upon review, the Court will require an expedited response
17 from Defendants and will set a hearing.

18 **IT IS HEREBY ORDERED** that Defendants shall file a Response to Plaintiff's
19 Corrected Emergency *Ex Parte* Motion for a Temporary Restraining Order (Doc. 7) by no
20 later than **5:00 PM** (Arizona time), **November 16, 2022**.

21 **IT IS FURTHER ORDERED** setting a hearing on the Motion for a Temporary
22 Restraining Order for Thursday, **November 17, 2022, at 10:00 AM** (Arizona time) in
23 Courtroom 505, 401 W. Washington Street, Phoenix, AZ 85003 before Judge John J.
24 Tuchi. Each side shall have 60 minutes to present whatever evidence or arguments they
25 wish to present.
26
27
28

Dated this 14th day of November, 2022.

- 2 -

ER0376

Marc J. Randazza, #027861
RANDAZZA LEGAL GROUP, PLLC
2764 Lake Sahara Drive, Suite 109
Las Vegas, NV 89117
Tel: (702) 420-2001
ecf@randazza.com

David S. Gingras, #021097
GINGRAS LAW OFFICE, PLLC
4802 E. Ray Road, #23-271
Phoenix, AZ 85044
Tel.: (480) 264-1400
Fax: (480) 248-3196
David@GingrasLaw.com

John C. Burns, MBE# 66462*
Burns Law Firm
P.O. Box 191250
Saint Louis, MO 63119
Tel: 314-329-5040
Fax: 314-282-8136
TBLF@pm.me

Attorneys for Plaintiffs
TPG Communications, LLC and Jordan Conradson

**pro hac vice forthcoming*

**UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

TGP Communications, LLC, d/b/a The
Gateway Pundit, a Missouri limited liability
company; and Jordan Conradson, an
individual,

Plaintiffs,

v.

Jack Sellers, Thomas Galvin, Bill Gates,
Clint Hickman, and Steve Gallardo, in their
respective official capacities as members of
the Maricopa County Board of Supervisors;
Stephen Richer, in his official capacity as

Case No. 2:22-cv-01925-JJT

**CORRECTED¹ EMERGENCY
EX PARTE MOTION FOR A
TEMPORARY RESTRAINING
ORDER**

¹ Corrected only as to the caption of this document.

1 the Maricopa County Recorder; Rey
2 Valenzuela and Scott Jarrett, in their official
3 capacities as Maricopa County Election
4 Directors; and Megan Gilbertson and
5 Marcus Milam, in their official capacities as
6 Maricopa County Communications
7 Officers,

Defendants.

EMERGENCY EX PARTE

MOTION FOR A TEMPORARY RESTRAINING ORDER

8 TGP Communications, LLC, d/b/a The Gateway Pundit (“TGP”) and Jordan
9 Conradson (“Conradson”) (together, “Plaintiffs”) files this Emergency Ex Parte Motion for
10 a Temporary Restraining Order, seeking to restrain Defendants Jack Sellers, Thomas
11 Galvin, Bill Gates, Clint Hickman, and Steve Gallardo, in their respective official
12 capacities as members of the Maricopa County Board of Supervisors; Stephen Richer, in
13 his official capacity as the Maricopa County Recorder; Rey Valenzuela and Scott Jarrett,
14 in their official capacities as Maricopa County Election Directors; and Megan Gilbertson
15 and Marcus Milam, in their official capacities as Maricopa County Communications
16 Officers (“Defendants”) from denying the rights guaranteed to Plaintiffs by the First
17 Amendment of the United States Constitution.

MEMORANDUM OF POINTS AND AUTHORITIES

1.0 Introduction

19 Open government has been a hallmark of our democracy since our nation's
20 founding. As James Madison wrote in 1822, “a popular Government, without popular
21 information, or the means of acquiring it, is but a Prologue to a Farce or a Tragedy; or,
22 perhaps both.” *Leigh v. Salazar*, 677 F.3d 892, 897 (9th Cir 2012) (citing 9 Writings of
23 James Madison 103 (G. Hunt ed. 1910)).
24
25

1 This case presents an urgent emergency. The nation's eyes are fixed on Maricopa
 2 County due to irregularities in handling the 2022 midterm elections. On election day In
 3 Maricopa County, an estimated 30% of voting locations experienced issues where their
 4 voting machines malfunctioned.² And here we are, three days after the election, with votes
 5 still being tallied at a seemingly glacial pace.

6 Understandably, the nation is fixated on this election. This is a matter of great
 7 national importance, and its importance stretches far beyond Arizona's borders.

8 It is no surprise that there is great skepticism on one side of the political divide and
 9 there is unqualified trust on the other. Society has degraded to the point that many
 10 Americans are skeptical of the good faith, the competence, and the bias of governmental
 11 institutions. However, this skepticism almost always comes down as a "Red" versus "Blue"
 12 issue. If a Republican makes a claim, one can expect "Team Blue" to scream at the top of
 13 their lungs that she must be corrupt, or worse. If a Democrat does the same, the "Red Team"
 14 is not going to take her statement at face value. We then depend on the press, such as it is,
 15 to inform us all so that we can at least hope to know what in tarnation is going on.

16 Our press is no less divided than our electorate. Our press has descended into a
 17 morass of competing partisan reporting that is no longer something Edward R. Murrow or
 18 Ben Bradlee would respect. Nevertheless, when the Free Press clause was placed in the
 19 Constitution, our national press was possibly even more divided and biased than it is today.

20 By the time the infant United States was taking its first furtive steps as a beacon of
 21 liberty, its press operated in a system of political patronage from the parties. This was
 22 known as "The Party Press Era." Newspapers publishers would cozy up to politicians,

23 ² See, e.g., Sasha Hupka, "Early glitches with Maricopa County election machines
 24 frustrate voters," AZCentral (Nov. 8, 2022), available at:
 25 <<https://www.azcentral.com/story/news/politics/elections/2022/11/08/arizona-election-problems-maricopa-county-tabulator-issues/8302133001/>>.

1 endorse their candidates, promote their agendas, and then receive baksheesh in the form of
2 financial support, prestige, and power. Anyone with any degree of media literacy today
3 would be unlikely to say that we have not returned to our roots. The only difference is that
4 today, the mainstream press operates much like the Party Press of the early Republic, but
5 they try and perpetrate the fiction that it is not so.

6 Meanwhile, if a tree falls in the forest and there is nobody there to hear it, everyone
7 will still tell the public what it sounded like and what it means. National Public Radio will
8 report that it happened because Donald Trump caused it with a post on Truth Social. This
9 claim would be followed by a two hour exposé on how trees in forests are racist. Fox News
10 will report the same story, but suggest that the tree fell because Hillary Clinton was trying
11 to kill a frog who had information about her being on Epstein's island. Who are we to
12 believe? We are all free to make that choice, but the greater the diversity of voices in the
13 marketplace of ideas, the better informed the public.

14 The Gateway Pundit is a news and opinion publication of national renown. Founded
15 Publisher Jim Hoft in 2004, The Gateway Pundit has grown into one of the largest and
16 most highly read political blogs in the nation. The Gateway Pundit is ranked as one of the
17 top 150 websites in the US, with an average of 2.5 million daily readers. *See* Declaration
18 of James Hoft at ¶ 1. It is considered by many to be a “conservative” publication, as its
19 editorial staff does tend to the libertarian/conservative side of things. In a national media
20 landscape where conservatives are an endangered species, this is a relative rarity. However,
21 the Gateway Pundit is no less a legitimate journalism organization than the New York
22 Times – which famously lied to the American public, at the behest of those who wanted
23 war in the Middle East, to push the agenda that there were WMDs in Iraq and that dutifully
24 reported on Trump's “Russian Collusion.” CNN lied about the “Covington Kids.” Rolling
25

Stone lied about “A Rape on Campus.” These were knowing lies, not mere mistakes, but Maricopa would certainly permit a New York Times, CNN, or Rolling Stone reporter to cover their actions – because these are politically loyal “Party Papers” as it were. However, the Defendants have decided, using unfettered discretion, to exclude the Gateway Pundit and its reporters from covering the election debacle. The stated reason was:

Thank you for applying for a Maricopa County Press Pass. This email is to notify you that you have been denied a press credential based on the following criteria which is listed on Maricopa.gov:

* #4: You (a) do not avoid real or perceived conflicts of interest and (b) are not free of associations that would compromise journalistic integrity or damage credibility. Therefore, you are not a bona fide correspondent of repute in your profession.

If you would like to appeal this decision, please reply to this email stating the reasons it should be reconsidered.

Further, any press conference about the 2022 Election will be streamed to a Maricopa County YouTube channel and you are welcome to view it.

Thank you,

Elections Command Center

See **Exhibit 1**, Emailed Denial & Appeal.

These criteria are unconstitutionally vague and reasonable minds could say the same things about the New York Times or CNN or National Public Radio without stretching a bit. Maricopa’s decision to exclude the Gateway Pundit is entirely viewpoint based. And thus, both facially and as applied, this regulation must be struck down. With the exigent circumstance of a “hot news” situation, the Gateway Pundit must be permitted to attend press conferences, immediately.

2.0 Legal Standard

A party seeking a preliminary injunction or temporary restraining order must meet one of two tests: traditional or alternative. *See Stanley v. Univ. of S. Cal.*, 13 F.3d 1313, 1319 (9th Cir. 1994). Under the traditional test, a plaintiff must show: (1) he will probably

1 prevail on the merits; (2) he will suffer irreparable injury if injunctive relief is not granted;
2 (3) the defendant will not be equitably harmed more than the plaintiff is helped by the
3 injunction; and (4) granting the injunction is in the public interest. *See id.* Alternatively, a
4 court may issue a preliminary injunction if the plaintiff shows either (1) a combination of
5 probable success on the merits and the possibility of irreparable injury, or (2) the existence
6 of serious questions going to the merits and that the balance of hardships tips sharply in its
7 favor. *See FDIC v. Garner*, 125 F.3d 1272, 1277 (9th Cir. 1997); *Metro Pub. Ltd. v. San*
8 *Jose Mercury News*, 987 F.2d 637, 639 (9th Cir. 1993). “The injury or threat of injury must
9 be both ‘real and immediate,’ not ‘conjectural’ or ‘hypothetical.’” *City of Los Angeles v.*
10 *Lyons*, 461 U.S. 95, 102 (1983).

11 Under these standards injunctive relief is appropriate when either of these two tests
12 are met. These are not two separate tests, but “merely extremes of a single continuum.”
13 *Topanga Press, Inc. v. City of Los Angeles*, 989 F.2d 1524, 1528 (9th Cir. 1993). This means
14 that if the balance of hardships strongly favors the plaintiff, he does not need to make as
15 strong a showing of success on the merits, and vice versa. *See Walczak v. EPL Prolong,*
16 *Inc.*, 198 F.3d 725, 731 (9th Cir. 1999).

17 When there is a violation of a constitutional right, no further showing of irreparable
18 injury is required. *See Associate General Contractors of California v. Coalition for*
19 *Economic Equity*, 950 F.2d 1401, 1410 (9th Cir. 1991). In fact, the first prong of the
20 “traditional” test is generally outcome determinative in First Amendment cases, as a chill
21 to one’s First Amendment rights is irreparable harm, a governmental entity can have no
22 legitimate interest in enforcing an unconstitutional regulation, and the public is not helped
23 by enforcing such a regulation. *See Thoms v. Maricopa Cty. Cmty. Coll. Dist.*, No. CV-21-
24 01781-PHX-SPL, 2021 U.S. Dist. LEXIS 214822, *35-39 (D. Ariz. Nov. 5, 2021).

3.0 Argument

The government's actions in this case are the government requiring a permit or a license to gather news. This has never been permissible in America. In fact, such schemes fell out of favor even before the Revolution. "Licensing of the press was never effective in the American colonies. The last attempt to enforce this common law right of the crown in the American colonies failed in 1725." *Chicago v. Tribune Co.*, 307 Ill. 595, 599 (Ill. 1923). Whether because the colonists would not accept press licensing or by the imposition of our Constitution after the Revolution, there is not, nor should there ever be, press licensing in America. If there were and the Courts did not step in, it "would make it easy for dictators to control their subjects." *Grosjean v. American Press Co.*, 297 U.S. 233, 240 (1936) (discussing press licensing through taxation). Maricopa County appears to believe that it has found a loophole – while it may not restrain opposition media from *publishing* by using a licensing scheme, it has decided that it will impede any opposition media's attempts to serve as a watchdog on government by licensing *newsgathering*.

This court must remind Maricopa County that when Arizona joined the union in 1912, it joined not *despite* this long tradition of embracing the freedom of the press, but *because* of it. Arizona made certain that even if the Federal Constitution ever changed, its state constitution would continue to protect freedom of the press. "Every person may freely speak, write, and publish on all subjects, being responsible for the abuse of that right." Ariz. Const. Art. 2, § 6.

This Honorable Court should grant the Plaintiff the right to gather the news, no matter whether the Maricopa County government likes their viewpoint or their politics or not. The regulations are unconstitutional, both facially and as applied.

3.1 Newsgathering and the First Amendment

The First Amendment protects newsgathering. *United States v. Sherman*, 581 F.2d 1358, 1361 (9th Cir. 1978); *see also Branzburg v. Hayes*, 408 U.S. 665, 681, 6 (1972) (“[W]ithout some protection for seeking out the news, freedom of the press could be eviscerated.”); *Cable News Network, Inc. v. Am. Broad. Cos.*, 518 F. Supp. 1238, 1244 (N.D. Ga. 1981) (“[T]he rights guaranteed and protected by the First Amendment include a right of access to news or information concerning the operations and activities of government.”)

The media serves an essential role as “surrogates for the public” when it reports on government affairs. *Richmond Newspapers v. Virginia*, 448 U.S. 555, 573 (1980); *see also Cox Broad. Corp. v. Cohn*, 420 U.S. 469, 490-91 (1975) (“[I]n a society in which each individual has but limited time and resources with which to observe at first hand the operations of his government, he relies necessarily upon the press to bring to him in convenient form the facts of those operations.”). “[A]rbitrary or content-based criteria for press pass issuance are prohibited under the first amendment.” *Sherrill v. Knight*, 569 F.2d 124, 129 (D.C. Cir. 1977).

In *Consumers Union v. Periodical Correspondents' Assoc.*, 365 F. Supp. 18, 22-23 (D.D.C. 1973), *rev'd on other grounds*, 169 U.S. App. D.C. 370, 515 F.2d 1341 (D.C. Cir. 1975), *cert. denied*, 423 U.S. 1051 (1976), the court held it was unconstitutional for the government to discriminate against Consumer Reports on grounds that it was “owned and operated” by a “self-proclaimed advocate of consumer interests.” The court further stated: “A free press is undermined if the access of certain reporters to facts relating to the public's business is limited merely because they advocate a particular viewpoint. This is a dangerous and self-defeating doctrine.” *Consumers Union*, 365 F. Supp. at 25.

The government may not exclude a publication because of their viewpoint or because their readership consists mainly of people who vote differently than they do. *See Quad-City Cmty News Serv. v. Jebens*, 334 F. Supp. 8, 17 (S.D. Iowa 1971) (stating “any classification which serves to penalize or restrain the exercise of a First Amendment right, unless shown to be necessary to promote a compelling governmental interest, is unconstitutional”). “[O]nce there is a public function, public comment, and participation by some of the media, the First Amendment requires equal access to all of the media, or the rights of the First Amendment would no longer be tenable.” *Am. Broad. Cos. v. Cuomo*, 570 F.2d 1080, 1083 (2d Cir. 1977). “[A]rbitrary or content-based criteria for press pass issuance are prohibited under the first amendment.” *Sherrill v. Knight*, 186 U.S. App. D.C. 293, 569 F.2d 124, 129 (1977) (citing *Branzburg v. Hayes*, 408 U.S. 665, 681, 707 (1972)).

The government, in this case, appears to try and save its decision by offering the Plaintiffs to watch streaming video of press conferences. However, this does not purge their actions of their unconstitutional sins. The court in *Consumers Union* stated:

While it is perfectly true that reporters do not have an unrestricted right to go where they please in search of news, ... the elimination of some reporters from an area which has been voluntarily opened to other reporters for the purpose of news gathering presents a wholly different situation. Access to news, if unreasonably or arbitrarily denied ..., constitutes a direct limitation upon the content of news.

Consumers Union, 365 F. Supp. at 25-26 (citations omitted)

“[A]ll representatives of news organizations must not only be given equal access, but within reasonable limits, access with equal convenience to official news sources.” *Westinghouse Broad. Co. Inc. v. Dukakis*, 409 F. Supp. 895, 896 (D. Mass. 1976). In a similar case, the government sought to segregate media into different areas. But even that was not permissible. *See United Teachers of Dade v. Stierheim*, 213 F. Supp. 2d 1368, 1374 (S.D. Fla. 2002) “[T]o the extent that entry into the ‘general-circulation media’ press

room provides media representatives with additional access to information, Plaintiffs' First Amendment rights are being violated.” *Id.*

3.2 The Regulations are Unconstitutionally Vague

A Policy is impermissibly vague if (1) “it fails to provide people of ordinary intelligence a reasonable opportunity to understand what conduct it prohibits” or (2) “it authorizes or even encourages arbitrary and discriminatory enforcement.” *Hill v. Colorado*, 530 U.S. 703, 732 (2000). Out of concern or arbitrary suppression of free speech, “the Constitution requires a ‘greater degree of specificity’ in cases involving First Amendment rights.” *Nat’l Org. for Marriage v. McKee*, 649 F.3d 34, 62 (1st Cir. 2011). “The vagueness of such a regulation raises special First Amendment concerns because of the obvious chilling effect on speech.” *Reno v. ACLU*, 521 U.S. 844, 872 (1997).

Defendants denied Plaintiffs’ press credentials using two unconstitutionally vague criteria. First, the requirement that journalists “avoid real or perceived conflicts of interest,” and second, that the journalists be “free of associations that would compromise journalistic integrity or damage credibility.” See **Exhibit 1**, Denial Email.

As to the first criteria, conflicts of interests, it is unclear what exactly is prohibited. Assuming one can suitably define what Defendants mean by a journalist having a “conflict of interest,” it is impossible to determine how a journalist may avoid being *perceived* to have a conflict of interest. Does giving positive coverage to one candidate or party cause a journalist to be perceived as having a conflict of interest, even if none exists? Can reporting critically on an elected official be perceived as having a conflict of interest in favor of their opponent? Moreover, it is not even clear what an actual conflict of interest could be for a journalist. Is appearing to favor a political party a conflict of interest? If that is the case, and the rule were applied evenly, Maricopa’s press conferences would likely be given to

an empty room, or one where only a few high school journalists, still untainted, would be permitted to participate. A person of “ordinary intelligence” would not be able to determine what conduct is actually prohibited by Defendants’ conflict of interest criteria. This unconstitutional vagueness lends itself to arbitrary enforcement, as has happened here.

Second, as to Defendants’ “free of associations” requirement, it is likewise unclear what conduct is prohibited. What does that even mean? What sort of associations would “compromise journalistic integrity or damage credibility?” Would being a member of a political party do so? Would voting for a certain candidate do so? Attending a candidate rally? Making a political donation? This regulation feels a lot like “Constitutional Violation Inception.” To violate the Free Press clause, they have chosen to use the exercise of the Free Association clause.

3.3 The Process is void of Due Process

Not only are the standards employed by Maricopa County vague and unworkable, the decision made in a star chamber, with no opportunity to be heard, no articulated standards, and no opportunity for meaningful appeal or review.

In a very closely analogous case, a court ruled that plaintiff had a likelihood of success on the merits for a due process claim because the government failed “to memorialize an explicit and meaningful standard governing its denial of press conference access.” *Alaska Landmine, LLC v. Dunleavy*, 514 F. Supp. 3d 1123, 1134 (D. Alaska 2021). The court further noted that an “absence of any formal process, policy, or procedure mak[ing] judicial review [of a First Amendment claim] difficult ... [] highlights the importance of due process as the vehicle by which First Amendment rights are protected.” *Id.* To bring a claim under the Due Process Clause, a plaintiff must show: “(1) a violation of rights protected by the Constitution or created by federal statute, (2) proximately caused

(3) by conduct of a person (4) acting under color of state law.” *Crumpton v. Gates*, 947 F.2d 1418, 1420 (9th Cir. 1991) (citation omitted).

Here, the government deprived Plaintiff of the right to gather the news without any due process. There is a protected interest in press access to government press conferences. In *Sherrill*, 569 F.2d at 130 the D.C. Cir. held that this access, for a news correspondent and his parent publication, “*undoubtedly* qualifies as liberty which may not be denied without due process of law under the [Fifth Amendment].” (emphasis added). Further, this is not just a right that benefits the particular plaintiffs – but the public at large. “Not only newsmen and the publications for which they write, but also the public at large have an interest protected by the [First Amendment] in assuring that ... individual newsmen not be arbitrarily excluded from sources of information”). *Id* at 129.

Usually in cases where there has been a deprivation of due process, there is an examination of the adequacy of the process. However, here the analysis is easier, since there was no process at all. A bureaucrat decided that The Gateway Pundit was not to their liking and evicted them from the Fourth Estate. Then, to make matters worse, they even continued to push them away from anywhere that they could meaningfully participate in news gathering at all. *See* Complaint at ¶ 33.

3.4 Defendants’ Regulations and Actions are Content-Based and Viewpoint-Based and act as an Impermissible Licensing of Newsgathering

Content-based and viewpoint-based restrictions “are presumptively unconstitutional and may be justified only if the government proves that they are narrowly tailored to serve compelling state interests.” *Reed v. Town of Gilbert, Ariz.*, 135 S. Ct. 2218, 2226 (2015). Our Constitutional alloy was forged in the fires of mistrust of government power. Therefore, the First Amendment is designed as a shield against government actors who would burden disfavored viewpoints. *Citizens United v. Fed. Election Comm’n*, 558 U.S.

310, 340 (2010). The point of the First Amendment is to deprive the government of the power to disfavor a particular message, ideas, subject matter, or content. *Consol. Edison Co. v. Pub. Serv. Comm’n*, 447 U.S. 530, 538 (1980). To weaken this protection would be to allow the government to control the “search for political truth.” *Id.* Content based restrictions “completely undercut the profound national commitment to the principle that debate on public issues should be uninhibited, robust, and [wide]-open.” *Police Dep’t of City of Chicago v. Mosley*, 408 U.S. 92, 96 (1972) (citation and quotation marks omitted).

The government may not condition the exercise of First Amendment protected rights on “obtaining a license or permit from a government official in that official’s boundless discretion.” *Forsyth Cty. v. Nationalist Movement*, 505 U.S. 123, 131 (1992) (deciding whether an official has unbridled discretion in setting permit fee for public speaking events, parades, or assemblies); *Se. Promotions v. Conrad*, 420 U.S. 546 (1975) (addressing whether municipal board charged with leasing city auditorium had unbridled discretion); *Saia v. People of N.Y.*, 334 U.S. 558, 559-60 (1948) (addressing whether licensing use of amplifiers gave police chief unfettered discretion); *Am. Entert. v. City of Rocky Mount*, 888 F.3d 707, 720 (4th Cir. 2018) (deciding licensing scheme for sexually oriented businesses gave licensing official unfettered discretion). Even Nazis marching, theatrical entertainment, or even nude dancing can not be subject to unfettered government discretion. Certainly the Freedom of the Press deserves at least as much respect as the freedom to perform lap dances.

In this case, the government created a limited public forum where the press may gather to question and observe government officials. *See Pleasant Grove City v. Summum*, 555 U.S. 460, 470 (2009) (defining a limited public forum as one “that is limited to use by certain groups or dedicated solely to the discussion of certain subjects”). However, the

1 government limited access to that forum using a vague and unworkable standard, which
2 they employ using unfettered discretion. In a public forum, “there is broad agreement that
3 ... investing governmental officials with boundless discretion over access to the forum
4 violates the First Amendment.” *Child Evangelism Fellowship of Md., Inc. v. Montgomery*
5 *Cnty. Pub. Sch.*, 457 F.3d 376, 386 (4th Cir. 2006)); *Kaahumanu v. Hawaii*, 682 F.3d 789,
6 806 (9th Cir. 2012).

7 “For this reason, even in cases involving nonpublic or limited public forums, a
8 policy ... that permits officials to deny access for any reason, or that does not provide
9 sufficient criteria to prevent viewpoint discrimination, generally will not survive
10 constitutional scrutiny.” *Id.* at 387. For time, place, and manner restrictions, “[a]s an
11 application of the requirement that restrictions be narrowly tailored, a law cannot condition
12 the free exercise of First Amendment rights on the ‘unbridled discretion’ of government
13 officials.” *Gaudiya Vaishnava Soc. v. San Francisco*, 952 F.2d 1059, 1065-67 (9th Cir.
14 1991) (finding unconstitutional ordinance requiring individuals to obtain a “peddling
15 permit” to sell merchandise that was “inextricably intertwined” with fully protected speech
16 when the chief of police had discretion to deny issuance of a permit and the ordinance
17 provided no specific grounds for granting or denying the permit and placed no explicit
18 limits on the chief’s discretion). And in a case involving a parade ordinance that allowed
19 the chief of police to move marchers onto sidewalks “in the interest of vehicular or
20 pedestrian safety,” the Ninth Circuit found that this gave an unconstitutional degree of
21 discretion to the government because of its breadth and the fact that it did not require
22 officials to articulate their reasons for denying permission to march in the streets, as well
23 as an absence of any mechanism for direct administrative or judicial review. *Seattle*

1 *Affiliate of the October 22nd Coalition To Stop Police Brutality, Repression & the*
 2 *Criminalization of a Generation v. City of Seattle*, 550 F.3d 788, 799-802 (9th Cir. 2008).

3 “Without standards governing the exercise of discretion, a government official may
 4 decide who may speak and who may not based upon the content of the speech or view-
 5 point of the speaker.” *City of Lakewood v. Plain Dealer Publ'g Co.*, 486 U.S. 750, 763-64
 6 (1988). A government regulation violates the First Amendment “[w]here the licensing
 7 official enjoys unduly broad discretion in determining whether to grant or deny a permit.”
 8 *World Wide Rush, LLC v. City of L.A.*, No. CV 07-238 ABC (JWJx), 2007 U.S. Dist.
 9 LEXIS 105249, *35 (C.D. Cal. July 23, 2007) (quoting *G.K. Ltd. Travel v. City of Lake*
 10 *Oswego*, 436 F.3d 1064, 1082 (9th Cir. 2006). The court in *World Wide Rush* enumerated
 11 “three considerations ... to determine whether an ordinance confers discretion in violation
 12 of the First Amendment”:

13 (1) whether the ordinance contains “reasonably specific” criteria on which a
 14 denial may rest; (2) whether the ordinance outlines objective factors to
 15 consider in denying an application under the “reasonably specific” criteria;
 16 and (3) whether the ordinance requires officials to “state the reasons for his
 17 or her decision to either grant or deny a permit so as to facilitate effective
 18 review of the official’s determination,” which allows the determination to be
 19 “enforceable on review.”

20 *Id.* at 35-36.

21 There is no reasonably specific criterion, nor are there objective factors, nor has the
 22 Defendant in any way stated the reasons for the decision to allow for effective review. This
 23 is unfettered discretion, and the government used this unfettered discretion to discriminate
 24 against the Gateway Pundit because they do not want to be challenged by the Gateway
 25 Pundit’s style of journalism – a style that does not uncritically act as a stenographer for the
 government narrative.

3.5 Equal Protection

The Equal Protection Clause provides that no state shall deny to any person within its jurisdiction equal protection of the laws. *See* U.S. Const. *amend. XIV*, § 1. In other words, “[p]ursuant to the Equal Protection Clause, the government must treat all similarly situated persons alike.” *Martinez v. Clark County*, 846 F. Supp. 2d 1131, 1135 (D. Nev. 2012). A plaintiff asserts a valid equal protection argument if it demonstrates that “a group was singled out for unequal treatment on the basis of religion.” *Carey v. Piphus*, 435 U.S. 247, 248 (1978). If the law that the plaintiff challenges burdens a fundamental right or makes a distinction based on a suspect classification, the Court should employ strict scrutiny review. *See OSU Student Alliance v. Ray*, 699 F.3d 1053, 1067 (9th Cir. 2012). Alternatively, if the law does not burden a fundamental right or target a suspect classification, it is subject to rational basis review. *See id.*

“[U]nder the Equal Protection Clause, not to mention the First Amendment itself, government may not grant the use of a forum to people whose views it finds acceptable, but deny use to those wishing to express less favored or more controversial views.” *Police Dep’t of Chicago v. Mosley*, 408 U.S. 92, 96 (1972). When brought together with claims for violation of one’s First Amendment freedom of speech, an equal protection claim typically shares the same analysis as the First Amendment claim. *Ray*, 699 F.3d at 1067.

Here, Plaintiffs were selectively treated – they were singled out for denial of a press pass specifically for the content and viewpoint of their speech. Because, as discussed above, if the standards were equally applied, the Press Conferences would be attended by no more than a Mesa high school reporter and two tumbleweeds.

3.6 Irreparable harm

The “loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury.” *Elrod v. Burns*, 427 U.S. 347, 373 (1976).

1 The freedom of the press does not only serve the press itself but exists to serve the public.
 2 *Alaska Landmine, LLC v. Dunleavy*, 514 F. Supp. 3d 1123, 1135 (“the foundational
 3 principle of the press clause of the First Amendment is that the media serves the public in
 4 offering both governmental transparency and information to the citizenry.”) Conversely,
 5 there is a public harm in only allowing “approved” press to cover government affairs, and
 6 the way the government has acted has a high probability of undermining confidence that
 7 the election is being tallied in a fair and above-board manner. Permitting the “opposition”
 8 press, press that would be critical of the government, will serve the government as well. If
 9 the press is excluded because the government thinks that its viewpoint is troubling, will
 10 this not stoke conspiracy theories and mistrust? The injunction will not only not burden the
 11 government, but it will also serve the government. “Without an unfettered press, citizens
 12 would be far less able to make informed political, social, and economic choices. But the
 13 press’ function as a vital source of information is weakened whenever the ability of
 14 journalists to gather news is impaired.” *Zerilli v. Smith*, 656 F.2d 705, 711 (D.C. Cir. 1981).

15 Maricopa’s bureau of elections certainly does look good right now. Arizona’s
 16 secretary of state is a gubernatorial candidate. A county that was predicted to lean heavily
 17 toward her opponent had massive failures in its systems on election day. Does this establish
 18 that something dishonest happened? Of course not. But, what would have been different if
 19 there was something dishonest afoot? Perhaps if there were something dishonest going on,
 20 the government would seek to exclude the press.

21 “When wrongdoing is underway, officials have great incentive to blindfold the
 22 watchful eyes of the Fourth Estate.” *Leigh v. Salazar*, 677 F.3d 892, 900 (9th Cir. 2012)
 23 (citing Timothy B. Dyk, *Newsgathering, Press Access, and the First Amendment*, 44 Stan.
 24 L. Rev. 927, 949 (1992) (“[W]hen the government announces it is excluding the press for
 25

reasons such as administrative convenience, preservation of evidence, or protection of reporters' safety, its real motive may be to prevent the gathering of information about government abuses or incompetence."'). And when the government restricts a publication because of its viewpoint, the government is trying to blind the critical press while allowing in the friendly press.

The Defendants will claim they are behaving honestly and unbiasedly in their apparent re-enactment of Florida in the 2000 election. However, if they are so honest, they should have no fear of any eyes and ears in the room, no matter how unfriendly. As a great jurist from neighboring Nevada said, when deciding a press access issue, "What better way to demonstrate to the public that its courts are fair and just than to say to the public, 'come and view the proceedings yourself and judge for yourself'?" *Suen v. Las Vegas Sands, Inc.*, Case No. A493744-C (Dist. Ct., Apr. 16, 2013). Indeed, if the Defendants have nothing to hide, then what better way to show the world that Maricopa County is competent and fair than to let everyone, regardless of viewpoint, see for themselves?

That is the gravamen of the injunctive relief sought.

4.0 Conclusion

Plaintiffs ask this Court to enter an immediate emergency injunction as requested.

Dated: November 14, 2022.

Respectfully submitted,

/s/ Marc J. Randazza

Marc J. Randazza, #027861

RANDAZZA LEGAL GROUP, PLLC

2764 Lake Sahara Drive, Ste. 109

Las Vegas, Nevada 89117

David S. Gingras, #021097

GINGRAS LAW OFFICE, PLLC

4802 E. Ray Road, #23-271

Phoenix, AZ 85044

John C. Burns, MBE# 66462*
Burns Law Firm
P.O. Box 191250
Saint Louis, MO 63119
Attorneys for Plaintiffs
TPG Communications, LLC and
Jordan Conradson
**pro hac vice forthcoming*

EXHIBIT 1

[TO MOTION FOR TEMPORARY
RESTRAINING ORDER]

Denial and Appeal Emails



Jonathon Burns <john@burns-law-firm.com>

Fwd: Re: Media Credential

1 message

jordanc@thegatewaypundit.com <jordanc@thegatewaypundit.com>
To: john@burns-law-firm.com

Thu, Nov 10, 2022 at 4:51 PM

----- Original Message -----

Subject: Re: Media Credential

Date: 10.11.2022 15:31

From: jordanc@thegatewaypundit.com

To: CAO Media - CAOX <CAOMedia@maricopa.gov>

On 30.09.2022 15:55, CAO Media - CAOX wrote:

Dear Mr. Conradson,

Thank you for applying for a Maricopa County Press Pass. This email is to notify you that you have been denied a press credential based on the following criteria which is listed on Maricopa.gov:

* #4: You (a) do not avoid real or perceived conflicts of interest and (b) are not free of associations that would compromise journalistic integrity or damage credibility. Therefore, you are not a bona fide correspondent of repute in your profession.

If you would like to appeal this decision, please reply to this email stating the reasons it should be reconsidered.

Further, any press conference about the 2022 Election will be streamed to a Maricopa County YouTube channel and you are welcome to view it.

Thank you,

Elections Command Center

Hello,

I applied for a media credential recently and I was denied. The denial of my request was sent to JordanC@thegatewaypundit.com. I am writing you to appeal this denial, as it violates my First Amendment rights to free speech and free press. Your denial of press credentials to me and my organization is a text-book impermissible content-based prior restraint of speech and in direct violation of my rights.

I will be coming in shortly to attend a press conference and receive my credentials.

Thank you,

Jordan Conradson

ER0397

Marc J. Randazza, #027861
 RANDAZZA LEGAL GROUP, PLLC
 2764 Lake Sahara Drive, Suite 109
 Las Vegas, NV 89117
 Tel: (702) 420-2001
 ecf@randazza.com

David S. Gingras, #021097
 GINGRAS LAW OFFICE, PLLC
 4802 E. Ray Road, #23-271
 Phoenix, AZ 85044
 Tel.: (480) 264-1400
 Fax: (480) 248-3196
 David@GingrasLaw.com

John C. Burns, MBE# 66462*
 Burns Law Firm
 P.O. Box 191250
 Saint Louis, MO 63119
 Tel: 314-329-5040
 Fax: 314-282-8136
 TBLF@pm.me

Attorneys for Plaintiffs
 TPG Communications, LLC and Jordan Conradson

**pro hac vice forthcoming*

**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
 IN AND FOR THE COUNTY OF MARICOPA**

TGP Communications, LLC, d/b/a The
 Gateway Pundit, a Missouri limited liability
 company; and Jordan Conradson, an
 individual,

Plaintiffs,

v.

Jack Sellers, Thomas Galvin, Bill Gates,
 Clint Hickman, and Steve Gallardo, in their
 respective official capacities as members of
 the Maricopa County Board of Supervisors;
 Stephen Richer, in his official capacity as
 the Maricopa County Recorder; Rey
 Valenzuela and Scott Jarrett, in their official

Case No. _____

**DECLARATION OF
 JORDAN CONRADSON**

- 1 -

Declaration of Jordan Conradson

capacities as Maricopa County Election Directors; and Megan Gilbertson and Marcus Milam, in their official capacities as Maricopa County Communications Officers,

Defendants.

DECLARATION OF JORDAN CONRADSON

I, Jordan Conradson, declare the following:

1. I am a Plaintiff in this matter and I am a reporter with Plaintiff TGP Communications, LLC, d/b/a The Gateway Pundit.

2. I have reviewed the facts and allegations in Plaintiffs' Complaint and *Ex Parte* Motion for a Temporary Restraining Order and I have personal knowledge of them. The facts and allegations in these documents are true and correct.

3. On or about September 27, 2022, I applied for press credentials to view the vote tabulation process in Maricopa County, Arizona and to participate in press conferences given by its officials.

4. On or about September 30, 2022, I received a notice from the Maricopa County Elections Department denying my request for press credentials. The denial email specifically stated:

Thank you for applying for a Maricopa County Press Pass. This email is to notify you that you have been denied a press credential based on the following criteria which is listed on Maricopa.gov:

- #4[sic]: You (a) do not avoid real or perceived conflicts of interest and (b) are not free of associations that would compromise journalistic integrity or damage credibility. Therefore, you are not a bona fide correspondent of repute in your profession.

5. After receiving this notice, I continued to report on matters of public concern in Maricopa County. However, on November 10, 2022, Maricopa County went even

1 further and did not allow me to remain on the curtilage of the Maricopa County Elections
2 Office and ejected me completely from the property, not even allowing me to be outside
3 the gate to cover the events inside in any manner at all. Upon being ejected, the government
4 used a drone to follow me to further intimidate me from continuing to make any meaningful
5 effort at newsgathering.

6 6. National elections are some of the most important events any press outlet can
7 cover and report on. They are the greatest test of a functioning democracy, and since 2020
8 there have been serious questions raised regarding the integrity of these elections, including
9 in Maricopa County.

10 7. Responsible reporting on this issue of paramount concern requires access to
11 primary sources of information, which requires access to the premises of relevant elections
12 offices.

13 8. Maricopa County's illegal and unconstitutional actions have harmed my
14 ability to exercise my First Amendment rights, particularly as a member of the press. I am
15 a reporter at a political blog, the Gateway Pundit, that reports a perspective that is usually
16 ignored by the corporate-owned press. Our readers expect me – particularly in a hotly
17 contested election – to probe and challenge public entities and public officials to ensure
18 that each are properly fulfilling their obligations to the citizens of the United States.

19 9. Being arbitrarily blocked from engaging public officials in their press
20 conferences prevents me from doing my job as a journalist. I cannot gain any first-hand
21 information. I cannot report any information. Even if I am capable of obtaining some
22 information that is newsworthy on this subject, Defendants' actions have made it
23 essentially impossible to verify such information so that I can responsibly and ethically
24
25

1 discharge my duties as a journalist. Without access, all of these common and necessary
2 components of journalism are made significantly more difficult.

3 10. Aside from hampering my ability to report the news, Defendants blocking
4 my access to government officials has also placed me at a distinct disadvantage compared
5 to other journalists who have not been barred access.

6 11. I am well aware of the “actual malice” standard set out in *New York Times*
7 *Co. v. Sullivan*, 376 U.S. 254 (1964). This standard establishes that a public figure plaintiff
8 may sue a journalist for defamation if the journalist published with actual malice. One of
9 the surest ways to avoid a finding or allegation of actual malice when reporting on public
10 officials is to actually confront these officials and ask them for comment.

11 12. By barring me from access to such officials, Defendants have also made it
12 significantly more dangerous to report on issues related to the 2022 election. I do not have
13 the ability to properly verify news stories I wish to publish about the election, which means
14 I am much more likely to be sued for any pieces I publish. This has made me much more
15 wary about publishing anything on this subject.

16 I declare under penalty of perjury that the foregoing is true and correct.

17 Dated: 11 / 12 / 2022.

18 

19 Jordan Conradson

Marc J. Randazza, #027861
 RANDAZZA LEGAL GROUP, PLLC
 2764 Lake Sahara Drive, Suite 109
 Las Vegas, NV 89117
 Tel: (702) 420-2001
 ecf@randazza.com

David S. Gingras, #021097
 GINGRAS LAW OFFICE, PLLC
 4802 E. Ray Road, #23-271
 Phoenix, AZ 85044
 Tel.: (480) 264-1400
 Fax: (480) 248-3196
 David@GingrasLaw.com

John C. Burns, MBE# 66462*
 Burns Law Firm
 P.O. Box 191250
 Saint Louis, MO 63119
 Tel: 314-329-5040
 Fax: 314-282-8136
 TBLF@pm.me

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**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
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 the Maricopa County Recorder; Rey
 Valenzuela and Scott Jarrett, in their official

Case No. _____

DECLARATION OF JAMES HOFT

- 1 -

Declaration of James Hoft

capacities as Maricopa County Election Directors; and Megan Gilbertson and Marcus Milam, in their official capacities as Maricopa County Communications Officers,

Defendants.

DECLARATION OF JAMES HOFT

I, James Hoft, declare the following:

1. I am the Editor and Publisher of Plaintiff TGP Communications, LLC d/b/a The Gateway Pundit. The Gateway Pundit is a news and opinion publication of national renown. I started The Gateway Pundit in my basement in 2004. Since then, The Gateway Pundit has grown into one of the largest and most highly read political blogs in the nation. The Gateway Pundit is ranked as one of the top 150 websites in the US, with an average of 2.5 million daily readers.

2. I have reviewed the facts and allegations in Plaintiffs' Complaint and *Ex Parte* Motion for a Temporary Restraining Order and I have personal knowledge of them. The facts and allegations in these documents are true and correct.

3. On or about September 27, 2022, The Gateway Pundit applied for press credentials to view the vote tabulation process in Maricopa County, Arizona and to participate in press conferences given by its officials.

4. On or about September 30, 2022, The Gateway Pundit received a notice from the Maricopa County Elections Department denying my request for press credentials. The denial email specifically stated:

Thank you for applying for a Maricopa County Press Pass. This email is to notify you that you have been denied a press credential based on the following criteria which is listed on Maricopa.gov:

- #4[sic]: You (a) do not avoid real or perceived conflicts of interest and (b) are not free of associations that would compromise journalistic

- 2 -

Declaration of James Hoft

1 integrity or damage credibility. Therefore, you are not a bona fide
2 correspondent of repute in your profession.

3 5. After receiving this notice, The Gateway Pundit continued to report on
4 matters of public concern in Maricopa County. However, on November 10, 2022, Maricopa
5 County went even further and did not allow The Gateway Pundit or any of its reporters to
6 remain on the curtilage of the Maricopa County Elections Office and ejected The Gateway
7 Pundit and its reporters completely from the property, not even allowing them to be outside
8 the gate to cover the events inside in any manner at all. Upon being ejected, the government
9 used a drone to follow The Gateway Pundit and its reporters to further intimidate them
10 from continuing to make any meaningful effort at newsgathering.

11 6. National elections are some of the most important events any press outlet can
12 cover and report on. They are the greatest test of a functioning democracy, and since 2020
13 there have been serious questions raised regarding the integrity of these elections, including
14 in Maricopa County.

15 7. Responsible reporting on this issue of paramount concern requires access to
16 primary sources of information, which requires access to the premises of relevant elections
17 offices.

18 8. Maricopa County's illegal and unconstitutional actions have harmed The
19 Gateway Pundit's ability to exercise its First Amendment rights, particularly as a member
20 of the press with millions of readers.¹ The Gateway Pundit is a political blog that reports

21 ¹ Whether the Court orders Maricopa County to grant press credentials or simply
22 orders it to permit Plaintiffs access is of little Constitutional difference. However, The
23 Gateway Pundit would prefer to be granted the rights sought by such credentials without
24 actually having the credentials, should this Court be so inclined. The reason for this is that
25 if the government grants such credentials to press outlets that it regards as no threat to it,
then the credentials are a badge of shame. Any press outlet that carries one today should
be ashamed of itself that it was seen as so impotent and so unlikely to challenge the
government that it was deemed "safe." Nevertheless, should Plaintiffs be required to sport

1 a perspective that is usually ignored by the corporate-owned press. Its readers expect it to
2 probe and challenge public entities and public officials to ensure that each are properly
3 fulfilling their obligations to the citizens of these United States.

4 9. Being arbitrarily blocked from engaging public officials in their press
5 conferences prevents The Gateway Pundit from doing its job as a journalistic enterprise.
6 The Gateway Pundit cannot gain any first-hand information. It cannot report any
7 information. Even if it is capable of obtaining some information that is newsworthy on this
8 subject, Defendants' actions have made it essentially impossible to verify such information
9 so that The Gateway Pundit can responsibly and ethically discharge its duties as a
10 journalistic outlet. Without access, all of these common and necessary components of
11 journalism are made significantly more difficult.

12 10. Aside from hampering The Gateway Pundit's ability to report the news,
13 Defendants blocking its access to government officials has also placed it at a distinct
14 disadvantage compared to other journalists and journalistic outlets who have not been
15 barred access.

16 11. The Gateway Pundit is well aware of the "actual malice" standard set out in
17 *New York Times Co. v. Sullivan*, 376 U.S. 254 (1964). This standard establishes that a
18 public figure plaintiff may sue a journalist for defamation if the journalist published with
19 actual malice. One of the surest ways to avoid a finding or allegation of actual malice when
20 reporting on public officials is to actually confront these officials and ask them for
21 comment.

22 12. By barring The Gateway Pundit from access to such officials, Defendants
23 have also made it significantly more dangerous to report on issues related to the 2022

24 such a badge, Plaintiffs will do so, but wish for the world to be reminded that they sport
25 the badge under protest, as no such credential should be required of a free press.

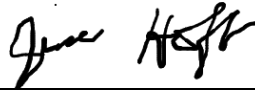
- 4 -

Declaration of James Hoft

1 election. The Gateway Pundit does not have the ability to properly verify news stories it
2 wishes to publish about the election, which means it is much more likely to be sued for any
3 pieces it publishes. This has made The Gateway Pundit much more wary about publishing
4 anything on this subject.

5 I declare under penalty of perjury that the foregoing is true and correct.

6 Dated: 11 / 12 / 2022.

7 

8 James Hoft

Marc J. Randazza, #027861
RANDAZZA LEGAL GROUP, PLLC
2764 Lake Sahara Drive, Suite 109
Las Vegas, NV 89117
Tel: (702) 420-2001
ecf@randazza.com

David S. Gingras, #021097
GINGRAS LAW OFFICE, PLLC
4802 E. Ray Road, #23-271
Phoenix, AZ 85044
Tel.: (480) 264-1400
Fax: (480) 248-3196
David@GingrasLaw.com

John C. Burns, MBE# 66462*
Burns Law Firm
P.O. Box 191250
Saint Louis, MO 63119
Tel: 314-329-5040
Fax: 314-282-8136
TBLF@pm.me

Attorneys for Plaintiffs
TPG Communications, LLC and Jordan Conradson

**pro hac vice forthcoming*

**UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

TGP Communications, LLC, d/b/a The
Gateway Pundit, a Missouri limited liability
company; and Jordan Conradson, an
individual,

Plaintiffs,

v.

Jack Sellers, Thomas Galvin, Bill Gates,
Clint Hickman, and Steve Gallardo, in their
respective official capacities as members of
the Maricopa County Board of Supervisors;
Stephen Richer, in his official capacity as

Case No. 2:22-cv-01925-JJT

**CORRECTED¹ CERTIFICATE
OF SERVICE**

¹ Corrected only as to the caption of this document.

the Maricopa County Recorder; Rey Valenzuela and Scott Jarrett, in their official capacities as Maricopa County Election Directors; and Megan Gilbertson and Marcus Milam, in their official capacities as Maricopa County Communications Officers,

Defendants.

CORRECTED CERTIFICATE OF SERVICE

Plaintiffs TGP Communications, LLC, d/b/a The Gateway Pundit (“TGP”) and Jordan Conradson (“Conradson”) (together, “Plaintiffs”) file this Certificate of Service and state that on November 12, 2022, copies of Plaintiffs’ Complaint and Emergency *Ex Parte* Motion for a Temporary Restraining Order are being served on Defendants via electronic mail at the addresses identified below:

Jack Sellers
sellersj@mail.maricopa.gov

Thomas Galvin
District2@maricopa.gov

Bill Gates
district3@mail.maricopa.gov

Clint Hickman
chickman@mail.maricopa.gov

Steve Gallardo
district5@mail.maricopa.gov

Stephen Richer
Recorder@risc.maricopa.gov

Rey Valenzuela
rvalenzuela@risc.maricopa.gov
voterinfo@risc.maricopa.gov

Scott Jarrett
SJarrett@risc.maricopa.gov
voterinfo@risc.maricopa.gov

Megan Gilbertson
mgilbertson@risc.maricopa.gov
CAOMedia@maricopa.gov

Marcus Milam
mmilam@risc.maricopa.gov
CAOMedia@maricopa.gov

Dated: November 14, 2022.

Respectfully submitted,

/s/ Marc J. Randazza

Marc J. Randazza, #027861
RANDAZZA LEGAL GROUP, PLLC
2764 Lake Sahara Drive, Ste. 109
Las Vegas, Nevada 89117

David S. Gingras, #021097
GINGRAS LAW OFFICE, PLLC
4802 E. Ray Road, #23-271
Phoenix, AZ 85044

John C. Burns, MBE# 66462*
Burns Law Firm
P.O. Box 191250
Saint Louis, MO 63119

Attorneys for Plaintiffs
TPG Communications, LLC and
Jordan Conradson

**pro hac vice forthcoming*

Marc J. Randazza, #027861
RANDAZZA LEGAL GROUP, PLLC
2764 Lake Sahara Drive, Suite 109
Las Vegas, NV 89117
Tel: (702) 420-2001
ecf@randazza.com

David S. Gingras, #021097
GINGRAS LAW OFFICE, PLLC
4802 E. Ray Road, #23-271
Phoenix, AZ 85044
Tel.: (480) 264-1400
Fax: (480) 248-3196
David@GingrasLaw.com

John C. Burns, MBE# 66462*
BURNS LAW FIRM
P.O. Box 191250
Saint Louis, MO 63119
Tel: 314-329-5040
Fax: 314-282-8136
TBLF@pm.me

Attorneys for Plaintiffs
TPG Communications, LLC and Jordan Conradson

**pro hac vice forthcoming*

**UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

TGP Communications, LLC, d/b/a The
Gateway Pundit, a Missouri limited liability
company; and Jordan Conradson, an
individual,

Plaintiffs,

v.

Jack Sellers, Thomas Galvin, Bill Gates,
Clint Hickman, and Steve Gallardo, in their
respective official capacities as members of
the Maricopa County Board of Supervisors;
Stephen Richer, in his official capacity as
the Maricopa County Recorder; Rey
Valenzuela and Scott Jarrett, in their official

Case No. _____

COMPLAINT

capacities as Maricopa County Election Directors; and Megan Gilbertson and Marcus Milam, in their official capacities as Maricopa County Communications Officers,

Defendants.

COMPLAINT

TGP Communications, LLC, d/b/a The Gateway Pundit (“TGP”) and Jordan Conradson (“Conradson”) (together, “Plaintiffs”) bring the following Complaint against Defendants Jack Sellers, Thomas Galvin, Bill Gates, Clint Hickman, and Steve Gallardo, in their respective official capacities as members of the Maricopa County Board of Supervisors; Stephen Richer, in his official capacity as the Maricopa County Recorder; Rey Valenzuela and Scott Jarrett, in their official capacities as Maricopa County Election Directors; and Megan Gilbertson and Marcus Milam, in their official capacities as Maricopa County Communications Officers (“Defendants”) and, in support of this Complaint, aver as follows:

INTRODUCTION

1. This is a case about the Freedom of the Press.
2. The Defendants have violated that freedom, to not only the Plaintiffs’ detriment but to the detriment of the entire marketplace of ideas.
3. Central to the people’s power in our democracy is the right to vote in free and fair elections. An integral part of that right is the duty of the press to inspect election processes to ensure that they are free and fair, and to call out corruption of the electoral process wherever it may be found. Or the opposite, to show the public that the process is fair, clean, and un-corrupt, thus fostering trust in our system.

1 4. This duty of the press can only be accomplished through the eyes of a reporter
2 on the ground; it is not sufficient for a news agency to rely on the reporting of others who
3 are so sufficiently gelded that the government approves of them. That is not how the
4 freedom of the press works.

5 5. If it were so, then the government would be able to select its preferred press
6 outlets, leaving any who may challenge the government to simply pick up the crumbs from
7 the table of the government-sponsored press.

8 6. That is what the government is doing, in Arizona, right now.

9 7. Plaintiff TGP is a news publication that conducts investigative journalism in
10 pursuit of an open government. Conradson is a reporter affiliated with TGP.

11 8. Maricopa County Elections Department requires a press pass to attend press
12 conferences and, as of November 10, 2022, apparently to even investigate or report on the
13 election process in Maricopa County, Arizona.

14 9. Conradson and TGP requested a press pass, despite the constitutionally
15 repugnant and facially invalid requirements and standards (or lack thereof) to receive one.

16 10. In violation of TGP and Conradson's First Amendment rights, Defendants
17 unlawfully denied their application for a press pass, stating that Conradson was "not a bona
18 fide correspondent of repute in [his] profession." And the Defendants further determined
19 in a "star chamber" process that TGP did not meet its standards for unbiased journalism.

20 11. The government does not get to pick and choose who is an approved
21 journalist and who is not, at least not on the basis of the content of the journalist's reporting
22 or their viewpoint.

23 12. As a result of Defendants' unlawful actions, Plaintiffs have been deprived of
24 their ability to investigate and report on the Arizona election process.
25

PARTIES

13. Plaintiff TGP Communications, LLC, d/b/a The Gateway Pundit is a Missouri limited liability company.

14. Plaintiff Jordan Conradson is a political reporter based in Arizona.

15. Defendants Jack Sellers, Thomas Galvin, Bill Gates, Clint Hickman, and Steve Gallardo comprise the Maricopa County Board of Supervisors, and are named in this action in their respective official capacities only. The Board of Supervisors is charged by law with conducting elections within its jurisdictional boundaries.

16. Defendant Stephen Richer is Recorder of Maricopa County, and is named in this action in his official capacity only. The County Recorder is the principal elections officer of Maricopa County and is responsible for overseeing and directing numerous components of election administration within this jurisdiction.

17. Defendants Rey Valenzuela and Scott Jarrett are the Election Directors of Maricopa County, and are named in this action in their respective official capacities only. The Maricopa County Election Directors are responsible for overseeing and directing numerous components of election administration within this jurisdiction.

18. Defendants Megan Gilbertson and Marcus Milam are two Maricopa Communications Officers, and are named in this action in their respective official capacities. The Maricopa Communications Officers are responsible for maintaining contact between Maricopa County and the press, and, upon information and belief, oversee approval of press credentials.

JURISDICTION AND VENUE

19. This Court has original subject matter jurisdiction over the federal Constitutional violations alleged in this Complaint pursuant to the provisions of 42

1 U.S.C. § 1983 and 28 U.S.C. § 1331 & 1343. This Court has jurisdiction to issue injunctive
2 and declaratory relief pursuant to 28 U.S.C. § 2201 and 42 U.S.C. § 1983.

3 20. Venue is proper in the District of Arizona pursuant to 28 U.S.C. § 1391. All
4 Defendants reside in Arizona, and all actions pertinent to this complaint occurred in
5 Maricopa County, Arizona.

6 **GENERAL ALLEGATIONS**

7 21. This year's election will control the outcome not only of individual races
8 across the country, but will also control the balance of power between the two major
9 political parties in the United States Congress.

10 22. Currently, Government officials in Maricopa County, Arizona are continuing
11 to count ballots which have been lodged by the people of Arizona.

12 23. The current election in Maricopa County has been fraught with
13 complications and issues, which may affect the impending results of this election.

14 24. Reasonable minds can disagree as to whether Maricopa County handled its
15 election duties competently, but there is no doubt that how they handled it, and how they
16 continue to handle it, is a matter of public concern and public debate.

17 25. Accordingly, it is of great interest to the press to view and inspect the
18 processes of the Maricopa County elections in order identify any issues with the election
19 process or assure the public that the election has been free and fair.

20 26. TGP is a news publication consisting of news, commentary, punditry, and
21 analysis. As many Americans continue to lose trust in the purportedly unbiased nature of
22 older "institutional" newspapers and networks, TGP highlights that it is addressing this gap
23 as a trusted news source for the stories and views that are largely untold or ignored by
24 traditional news outlets. One of its core values is that it "must have courage in order expose
25

the truth about powerful interests that may be angered by our coverage.” Part of TGP’s mission is conducting investigative journalism in pursuit of an open government.

27. Maricopa County has established a special procedure for members of the press to participate in election coverage within its jurisdiction. Maricopa County’s website states that: “Maricopa County will require an official Press Pass for members of the press to enter its facilities and/or cover events related to the 2022 General Election.” See **Exhibit 1**, Maricopa County 2022 Elections Press Pass.¹

28. The Maricopa County website further states that members of the press will be evaluated based upon the following criteria:

- a. Is the person requesting press credentials employed by or affiliated with an organization whose principal business is news dissemination?
- b. Does the parent news organization meet the following criteria?
 - i. It has published news continuously for at least 18 months, and;
 - ii. It has a periodical publication component or an established television or radio presence.
- c. Is the petitioner a paid or full-time correspondent, or if not, is acting on behalf of a student-run news organization affiliated with an Arizona high school, university, or college?
- d. Is the petitioner or its employing organization engaged in any lobbying, paid advocacy, advertising, publicity, or promotion work for any individual, political party, corporation, or organization?
- e. Is the petitioner a bona fide correspondent of repute in their profession, and do they and their employing organization exhibit the following characteristics?
 - i. Both avoid real or perceived conflicts of interest;
 - ii. Both are free of associations that would compromise journalistic integrity or damage credibility;

¹ Available at: <<https://www.maricopa.gov/5856/Maricopa-County-2022-Elections-Press-Pas>> (last accessed Nov. 11, 2022).

iii. Both decline compensation, favors, special treatment, secondary employment, or political involvement where doing so would compromise journalistic integrity; and

iv. Both resist pressures from advertisers, donors, or any other special interests to influence coverage.

This list is not exhaustive. The time, manner, and place limitations or needs of any one event may require consideration of additional factors.

See Exhibit 1.

29. The Maricopa County Elections website includes a link through which reporters can apply for registration and access to a press pass. *See Exhibit 2*, County Press Page Registration form. The application requests the name and contact information for the reporter, the news organization the reporter works for, contact information for the reporter's supervisor, and links to examples of the reporter's work. *See id.*

30. On or about September 27, 2022, TGP and its reporter Conradson applied for press credentials to view the vote tabulation process in Maricopa County and to participate in press conferences given by its officials. *See Exhibit 3*, Completed Registration Form.

31. On or about September 30, 2022, TPG and Conrad received a notice from the Maricopa County Elections Department denying their request for press credentials. The denial email specifically stated:

Thank you for applying for a Maricopa County Press Pass. This email is to notify you that you have been denied a press credential based on the following criteria which is listed on Maricopa.gov:

- #4[sic]: You (a) do not avoid real or perceived conflicts of interest and (b) are not free of associations that would compromise journalistic integrity or damage credibility. Therefore, you are not a bona fide correspondent of repute in your profession.

See Exhibit 4, Denial and Appeal Email.

32. Plaintiffs continued to report on the matters of public concern in Maricopa County, but they simultaneously attempted to convince Maricopa to change its mind. Its letter demanding a change was ignored.

33. On November 10, 2022, Maricopa county however took this rejection even further, not even allowing the Plaintiffs to remain on the curtilage of the Maricopa County Elections Office, and ejected them completely from the property, not even allowing them to be outside the gate to cover the events inside in any manner at all, and upon being ejected, the government used a drone to follow them to further intimidate them from continuing to make any meaningful effort at newsgathering.

34. Other members of the press who apparently worked for media outlets that were deemed sufficiently compliant with the government were allowed to attend and remain within the cordon set up around the Maricopa County building.

35. Accordingly, TGP and Conradson were unable to participate in that press conference and future press conferences, and they were unable to view the ballot-counting process which is essential to their reporting – not even from afar.

36. On November 10, 2022, TGP and Conradson transmitted a written appeal email to Defendants. *See Exhibit 4*, Denial and Appeal Email.

37. Further, on November 10, 2022, counsel for TGP transmitted a letter to Defendants demanding that press credentials be issued immediately to TGP and Conradson and putting Defendants on notice that their continued denial of press credentials was unlawful. *See Exhibit 5*, John C. Burns letter dated November 10, 2022.

38. Any reasonable person in America should have known that this was unlawful, as this very issue was the matter of extensive press coverage when then-President

Donald Trump decided that Jim Acosta and CNN were not sufficiently compliant with his administration, and thus they were barred from the White House press corps.²

39. To-date, Defendants have not issued press credentials to Defendants, and have barred them from even approaching the building where our democracy hangs in the balance. This is a clear effort to impede the Plaintiffs' efforts to gather the news. Defendants are unable to participate in press conferences or view the vote tabulating process in Maricopa County – not even from outside the building.

CLAIMS FOR RELIEF

FIRST CLAIM FOR RELIEF

Violation of the U.S. Const., Amendment I under 42 U.S.C. § 1983

40. Plaintiffs repeat, reallege, and incorporate the allegations in the paragraphs above as though fully set forth herein.

41. Defendants' decision to deny press credentials on the basis of the Plaintiffs' viewpoint violates the First Amendment.

42. Defendants went even further, by not even allowing Plaintiffs to approach the building where the vote counting is taking place, again on the basis of viewpoint.

43. Plaintiffs' access to the Maricopa government facilities, their coverage of the ongoing election in Maricopa County, and their participation in official Maricopa County election press conferences are and were all protected activities under the First Amendment.

² See, e.g., Paul Farhi, "Judge hands CNN a victory in its bid to restore Jim Acosta's White House press pass," Washington Post (Nov. 16, 2018), available at: <https://www.washingtonpost.com/lifestyle/style/judge-hands-cnn-victory-in-its-bid-to-restore-jim-acostas-white-house-press-pass/2018/11/16/8bedd08a-e920-11e8-a939-9469f1166f9d_story.html>; Jessica Gresko and Michael Balsamo, "Judge orders White House to immediately return CNN's Jim Acosta's press pass," KPNX 12News (Nov. 16, 2018), available at: <<https://www.12news.com/article/news/nation-world/judge-to-rule-friday-in-cnn-reporters-white-house-credential-case/507-615125521>>.

44. Defendants have deprived Plaintiffs of their right to access the Maricopa County government facilities by denying Conradson's press credentials. Without those credentials, Conradson cannot access Maricopa County government buildings and cannot effectively view on the ongoing election process in Maricopa County and ask questions of Maricopa County government officials, thus depriving Plaintiff TGP of its ability to report on the election process.

45. As purported ground for denying Plaintiffs' press credentials, Defendants claim that Conradson does not "avoid real or perceived conflicts of interest," is not "free of associations that would compromise journalistic integrity or damage credibility," and is not "a bona fide correspondent of repute in [his] profession."

46. Defendants have no basis for these determinations. The standards are unworkably and unconstitutionally vague and function as an unlawful licensing scheme to limit newsgathering to preferred or controlled media.

47. Defendants' justifications for impeding Plaintiffs' First Amendment rights are not sufficiently compelling to justify denial of press credentials. Consequently, the only reasonable inference from Defendants' conduct is that they have denied Conradson a "newsgathering license" as a form of content- and viewpoint-based discrimination and in retaliation for Plaintiffs' exercise of protected First Amendment activity.

48. The sole justification for Defendants' conduct is their dislike for Plaintiffs' politics and critique of the election processes. But that is insufficient to justify such a substantial restriction on Plaintiffs' First Amendment rights.

49. Defendants' criteria for granting press credentials to the media is subjective and violates Plaintiffs' First Amendments rights.

50. Defendants' criteria for granting press credentials to the media unlawfully grants them unfettered discretion to choose which media may provide favorable coverage of Defendants and their management of the election process in Maricopa County.

51. Defendants' denial of Plaintiffs' press credentials violates the Freedom of Press guaranteed to them under the First Amendment.

52. Defendants' denial of Plaintiffs' press credentials violates the Freedom of Speech guaranteed to them under the First Amendment.

53. Defendants' denial of Plaintiffs' press credentials violates the Freedom of Association guaranteed to them under the First Amendment.

54. Defendants' criteria for determining who is eligible for press passes in Maricopa County are unconstitutionally vague.

55. Plaintiffs have been injured, or reasonably fear imminent injury, by these constitutional violations, and Plaintiffs are entitled to relief.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs TGP Communications, LLC, d/b/a The Gateway Pundit and Jordan Conradson respectfully request that the Court enter judgment in Plaintiffs favor, and against Defendants, providing the following relief:

A. Immediate authorization of Conradson's press credentials or in the absence of such credentials, access to newsgathering and press conferences equal to other press outlets, so that Plaintiffs may continue to report from Maricopa County government premises and perform their jobs viewing and reporting on the election process;

B. A declaration that the denial of Conradson press credentials was unconstitutional, in violation of the First Amendment; and,

- 1 C. A declaration that the press credential regulations are unconstitutional; and,
2 D. All costs, disbursements, fees, and interest; and,
3 E. Such other and additional remedies as the Court may deem just and proper.

4 **JURY DEMAND**

5 Plaintiffs demand a jury trial on all issues so triable.

6
7 Dated: November 12, 2022.

Respectfully submitted,

8 /s/ Marc J. Randazza

9 Marc J. Randazza, #027861
10 RANDAZZA LEGAL GROUP, PLLC
2764 Lake Sahara Drive, Ste. 109
Las Vegas, Nevada 89117

11 David S. Gingras, #021097
12 GINGRAS LAW OFFICE, PLLC
4802 E. Ray Road, #23-271
13 Phoenix, AZ 85044

14 John C. Burns (*pro hac vice* forthcoming)
BURNS LAW FIRM
15 P.O. Box 191250
St. Louis, Missouri 63119

16 Attorneys for Plaintiffs
17 TPG Communications, LLC and
Jordan Conradson

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Civil Cover Sheet

This automated JS-44 conforms generally to the manual JS-44 approved by the Judicial Conference of the United States in September 1974. The data is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. The information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is authorized for use only in the District of Arizona.

The completed cover sheet must be printed directly to PDF and filed as an attachment to the Complaint or Notice of Removal.

Plaintiff(s): **TGP Communications, LLC ; Jordan Conradson**

Defendant(s): **Jack Sellers ; Thomas Galvin ; Bill Gates ; Clint Hickman ; Steve Gallardo ; Stephen Richer ; Rey Valenzuela ; Scott Jarrett ; Megan Gilbertson ; Marcus Milam**

County of Residence: Outside the State of Arizona

County of Residence: Maricopa

County Where Claim For Relief Arose: Maricopa

Plaintiff's Atty(s):

Defendant's Atty(s):

**Marc John Randazza (TGP Communications, LLC ; Jordan Conradson)
Randazza Legal Group, PLLC
2764 Lake Sahara Drive, Suite 109
Las Vegas, Nevada 89117
702-420-2001**

**David S. Gingras (TGP Communications, LLC ; Jordan Conradson)
Gingras Law Office, PLLC
4802 E. Ray Road, #23-271
Phoenix, Arizona 85044
(480) 264-1400**

II. Basis of Jurisdiction:

3. Federal Question (U.S. not a party)

III. Citizenship of Principal Parties (Diversity Cases Only)

Plaintiff:- N/A
Defendant:- N/A

IV. Origin :

1. Original Proceeding

V. Nature of Suit:

440 Other Civil Rights

ER0422

VI. Cause of Action: **42 U.S.C. § 1983**

VII. Requested in Complaint

Class Action: **No**

Dollar Demand:

Jury Demand: **Yes**

VIII. This case is not related to another case.

Signature: /s/ Marc J. Randazza

Date: 11/12/2022

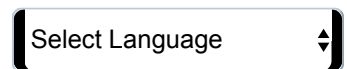
If any of this information is incorrect, please go back to the Civil Cover Sheet Input form using the *Back* button in your browser and change it. Once correct, save this form as a PDF and include it as an attachment to your case opening documents.

Revised: 01/2014

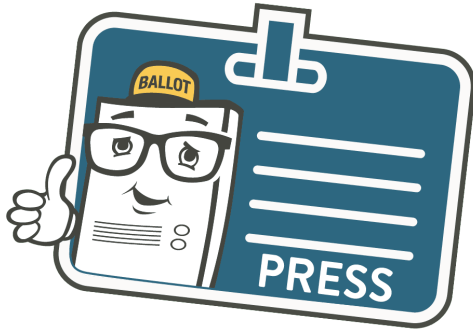
EXHIBIT 1

[TO COMPLAINT]

Maricopa County 2022 Elections Press Pass
Webpage



MARICOPA COUNTY 2022 ELECTIONS PRESS PASS



Maricopa County will require an official Press Pass for members of the press to enter its facilities and/or cover events related to the 2022 General Election. Because of logistical and security considerations, it is impossible to give the public and media limitless access to Members of the Board of Supervisors, the County Recorder and election experts for events such as press conferences and availabilities.

Official Press Pass Criteria

The official press pass will allow a member of the press to attend news conferences or enter the Elections Department's office to conduct interviews, take photos, and/or video.
(see disclaimer below)

"Member of the press" will be evaluated by Maricopa County on the following criteria:

1

Is the person requesting press credentials employed by or affiliated with an organization whose principal business is news dissemination?

2

Does the parent news organization meet the following criteria?

- a. It has published news continuously for at least 18 months, and;
- b. It has a periodical publication component or an established television or radio presence.

3

Is the petitioner a paid or full-time correspondent, or if not, is acting on behalf of a student-run news organization affiliated with an Arizona high school, university, or college?

4

Is the petitioner or its employing organization engaged in any lobbying, paid advocacy, advertising, publicity, or promotion work for any individual, political party, corporation, or organization?

5

Is the petitioner a bona fide correspondent of repute in their profession, and do they and their employing organization exhibit the following characteristics?

- a. Both avoid real or perceived conflicts of interest;
- b. Both are free of associations that would compromise journalistic integrity or damage credibility;
- c. Both decline compensation, favors, special treatment, secondary employment, or political involvement where doing so would compromise journalistic integrity; and
- d. Both resist pressures from advertisers, donors, or any other special interests to influence coverage.

This list is not exhaustive. The time, manner, and place limitations or needs of any one event may require consideration of additional factors.

Members of the news media must submit [this form for review](#).

Each staff member must apply. Maricopa County will not issue a generic pass to a news organization to be used by any staff member.

Please allow at least three days before an event for pass approval. Passes must be picked up in person at the Maricopa County Tabulation and Elections Center, 510 S. 3rd Ave. Phoenix AZ 85003. Be prepared to show a valid driver license, state ID, or passport to receive credentials.

EXHIBIT 2

[TO COMPLAINT]

Maricopa County 2022 Elections Press Pass
Application



Select Language ▾

Form Center



County Press Pass Registration

Journalist Full Name*

Phone Number*

Email Address*

Address*

City*

State*

Zip Code*

News Organization*

Name of Direct Supervisor

Direct Supervisor Phone Number*

Direct Supervisor Email Address*

Dates of Planned Coverage

Provide 3 Links to Work Examples*

Electronic Signature Agreement*

By signing this application for a Maricopa County Press Pass, I certify that I am a journalist without a conflict of interest or association that would compromise my journalistic integrity.

Further, I do not receive compensation or special treatment from advertisers or political organizations that would influence my coverage related to Maricopa County or its elections.

I am not a lobbyist, advertiser, paid advocate or influencer for any individual, political party, corporation, or organization.

☐ I agree.

Electronic Signature*

Upload Photo for Press Pass*

no file selected

Important Note:

Please allow at least three days before an event for pass approval. Passes must be picked up in person at the Maricopa County Tabulation and Elections Center, 510 S. 3rd Ave. Phoenix AZ 85003.

Be prepared to show a valid driver license, state ID, or passport to receive credentials.

protected by reCAPTCHA

[Privacy](#) - [Terms](#)



☒ Receive an email copy of this form.

Email address

This field is not part of the form submission.

* indicates a required field

[▲ Back to top](#)

EXHIBIT 3

[TO COMPLAINT]

Press Pass Application



Trey Rothell <tar@randazza.com>

Fwd: Online Form Submittal: County Press Pass Registration

1 message

Marc Randazza <mjr@randazza.com>
To: Trey Rothell <tar@randazza.com>

Fri, Nov 11, 2022 at 10:26 AM

----- Forwarded message -----

[REDACTED]

[REDACTED]

[REDACTED]

Begin forwarded message:

[REDACTED]

----- Original Message -----

Subject: Online Form Submittal: County Press Pass Registration

Date: 27.09.2022 21:13

From: noreply@civicplus.com

To: Jordanc@thegatewaypundit.com

COUNTY PRESS PASS REGISTRATION

Journalist Full Name
Jordan P Conradson

Phone Number
6027106527

Email Address
Jordanc@thegatewaypundit.com

Address
[1225 n 36th st #2011](#)

City
Phoenix

State
AZ

ER0434

Zip Code
85008

News Organization
The Gateway Pundit

Name of Direct Supervisor
Jim Hoft

Direct Supervisor Phone Number
3143040830

Direct Supervisor Email Address
Jimhoft@gmail.com

Dates of Planned Coverage
September 28 - November 15

Provide 3 Links to Work Examples

<https://www.thegatewaypundit.com/2022/09/watch-trump-endorsed-kari-lake-joins-tucker-carlson-italy-elects-first-female-populist-leader-not-attacking-probably-not-truly-representing/>
<https://www.thegatewaypundit.com/2022/09/fcked-really-dont-real-true-freedom-speech-youtube-star-pro-boxer-jake-paul-responds-gateway-pundit-reporters-question-big-tech-censorship-pre-fig/>
<https://www.thegatewaypundit.com/2022/09/maricopa-county-appointed-100-democratic-poll-workers-republicans-extremely-flawed-primary-election-eleven-locations-no-republicans/>

Electronic Signature Agreement
I agree.

Electronic Signature
Jordan P. Conradson

Upload Photo for Press Pass
6361F7CD-FCF4-4F46-A4E3-EED30BE9D22E.jpeg

Important Note:

Please allow at least three days before an event for pass approval.
Passes must be picked up in person at the Maricopa County Tabulation and Elections Center, [510 S. 3rd Ave. Phoenix AZ 85003](#) [1].

Be prepared to show a valid driver license, state ID, or passport to receive credentials.

Links:

[1] <https://www.google.com/maps/place/510+S+3rd+Ave,+Phoenix,+AZ+85003/@33.442704,-112.0805887,17z/data=!3m1!4b1!4m5!3m4!1s0x872b1189e39b61dd:0xa4b87be3007ea7c818m2!3d33.442704!4d-112.0784>

--

Marc John Randazza, JD, MAMC, LLM* | [Randazza Legal Group](#)

2764 Lake Sahara Drive, Suite 109, Las Vegas, NV 89117

30 Western Avenue, Gloucester, MA 01930

2 S Biscayne Boulevard, Suite 2680, Miami, FL 33131

Tel: 702-420-2001 | Email: mjr@randazza.com

Firm Offices - Las Vegas | Miami | New England

ER0435

* Licensed to practice law in Arizona, California, Florida, Massachusetts, and Nevada.

EXHIBIT 4

[TO COMPLAINT]

Denial and Appeal Emails



Jonathon Burns <john@burns-law-firm.com>

Fwd: Re: Media Credential

1 message

jordanc@thegatewaypundit.com <jordanc@thegatewaypundit.com>
To: john@burns-law-firm.com

Thu, Nov 10, 2022 at 4:51 PM

----- Original Message -----

Subject: Re: Media Credential

Date: 10.11.2022 15:31

From: jordanc@thegatewaypundit.com

To: CAO Media - CAOX <CAOMedia@maricopa.gov>

On 30.09.2022 15:55, CAO Media - CAOX wrote:

Dear Mr. Conradson,

Thank you for applying for a Maricopa County Press Pass. This email is to notify you that you have been denied a press credential based on the following criteria which is listed on Maricopa.gov:

* #4: You (a) do not avoid real or perceived conflicts of interest and (b) are not free of associations that would compromise journalistic integrity or damage credibility. Therefore, you are not a bona fide correspondent of repute in your profession.

If you would like to appeal this decision, please reply to this email stating the reasons it should be reconsidered.

Further, any press conference about the 2022 Election will be streamed to a Maricopa County YouTube channel and you are welcome to view it.

Thank you,

Elections Command Center

Hello,

I applied for a media credential recently and I was denied. The denial of my request was sent to JordanC@thegatewaypundit.com. I am writing you to appeal this denial, as it violates my First Amendment rights to free speech and free press. Your denial of press credentials to me and my organization is a text-book impermissible content-based prior restraint of speech and in direct violation of my rights.

I will be coming in shortly to attend a press conference and receive my credentials.

Thank you,

Jordan Conradson

ER0438

EXHIBIT 5

[TO COMPLAINT]

Letter from John C. Burns
dated November 10, 2022

BURNS LAW FIRM

P.O. BOX 191250
ST. LOUIS, MO 63119
Tel.: 314-329-5040
Fax: 314-282-8136

JOHN C. BURNS, Esq.
tblf@pm.me

November 10, 2022

**VIA FEDEX OVERNIGHT DELIVERY
AND ELECTRONIC MAIL TO voterinfo@risc.maricopa.gov,
recorder@risc.maricopa.gov, mgilbertson@risc.maricopa.gov,
And PIO@risc.maricopa.gov**

Stephen Richer
Maricopa County Recorder's Office
111 S. Third Avenue
Phoenix, AZ 85003

Maricopa County Elections Department
510 S. 3rd Avenue,
Phoenix, AZ 85003

Re: Immediate Cease and Desist from Further First Amendment Violations

Dear Mr. Richer:

My firm represents The Gateway Pundit (www.thegatewaypundit.com) and its reporters, including Jordan Conradson. As you know, the media are vested with a number of rights in the United States, the most important of which is the First Amendment. However, it has come to my attention that your office and members of the "Elections Command Center" have arbitrarily and maliciously excluded my clients from attending press conferences.

For example, Mr. Conradson requested access and he was sent an email denial stating:

Thank you for applying for a Maricopa County Press Pass.
This email is to notify you that you have been denied a press credential based on the following criteria which is listed on Maricopa.gov:

- 1 -

Stephen Richer, Maricopa County Recorder
November 10, 2022

ER0440

- #4: You (a) do not avoid real or perceived conflicts of interest and (b) are not free of associations that would compromise journalistic integrity or damage credibility.

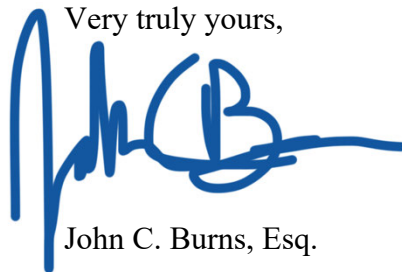
Therefore, you are not a bona fide correspondent of repute in your profession.

Your office's denial of press credentials to my clients is a **text-book impermissible content-based prior restraint of speech** and in direct violation of my clients' rights. *See generally, Shurtleff v. Boston*, 596 U.S. ____ (2022); *see also Rossignol v. Voorhaar*, 316 F.3d 516 (4th Cir. 2003). You have no legitimate ability to do this and your office is incurring legal liability by engaging in this obvious gamesmanship.

On behalf of my clients, I demand that you immediately cease this outrageous conduct and permit my clients to access the press conferences of the "Elections Command Center." If you do not do so immediately, then we will be filing a civil rights lawsuit pursuant to 42 U.S.C. § 1983 for injunctive relief and damages under the First and Fourteenth Amendments to the United States Constitution.

Please contact me immediately to indicate whether you intend to honor and abide my clients' rights. My direct line is 314-329-5040.

Very truly yours,

A handwritten signature in blue ink, appearing to read "JCB", with a stylized flourish extending to the right.

John C. Burns, Esq.

Attorney for
The Gateway Pundit
Jordan Conradson

JCB/er

cc: Megan Gilbertson, Marcus Milam, Jordan Conradson, Jim Hoft

Marc J. Randazza, #027861
RANDAZZA LEGAL GROUP, PLLC
4974 S. Rainbow Blvd., Suite 100
Las Vegas, NV 89118
Tel: (702) 420-2001
ecf@randazza.com

David S. Gingras, #021097
GINGRAS LAW OFFICE, PLLC
4802 E. Ray Road, #23-271
Phoenix, AZ 85044
Tel.: (480) 264-1400
Fax: (480) 248-3196
David@GingrasLaw.com

John C. Burns, MBE# 66462*
Burns Law Firm
P.O. Box 191250
Saint Louis, MO 63119
Tel: 314-329-5040
Fax: 314-282-8136
TBLF@pm.me

Attorneys for Plaintiffs
TPG Communications, LLC and Jordan Conradson

**pro hac vice forthcoming*

**UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

TGP Communications, LLC, d/b/a The
Gateway Pundit, a Missouri limited liability
company; and Jordan Conradson, an
individual,

Plaintiffs,

v.

Jack Sellers, Thomas Galvin, Bill Gates,
Clint Hickman, and Steve Gallardo, in their
respective official capacities as members of
the Maricopa County Board of Supervisors;
Stephen Richer, in his official capacity as
the Maricopa County Recorder; Rey
Valenzuela and Scott Jarrett, in their official

Case No. 2:22-cv-01925-JJT

NOTICE OF APPEAL

capacities as Maricopa County Election Directors; and Megan Gilbertson and Marcus Milam, in their official capacities as Maricopa County Communications Officers,

Defendants.

NOTICE OF APPEAL

Notice is hereby given that Plaintiffs TGP Communications, LLC d/b/a The Gateway Pundit and Jordan Conradson (“Plaintiffs”) appeal to the United States Court of Appeals for the Ninth Circuit from the Order (Dkt. No. 27) entered by the United States District Court for the District of Arizona on November 23, 2022, including all adverse findings, holdings, and orders set forth therein. The Court’s Order is subject to interlocutory appeal. *See* 28 USC 1292(a)(1); *Religious Tech. Ctr. v. Scott*, 869 F.2d 1306, 1308-09 (9th Cir. 1989).

Dated: November 28, 2022.

Respectfully submitted,

/s/ Marc J. Randazza

Marc J. Randazza, #027861
RANDAZZA LEGAL GROUP, PLLC
4974 S. Rainbow Blvd., Suite 100
Las Vegas, Nevada 89118

David S. Gingras, #021097
GINGRAS LAW OFFICE, PLLC
4802 E. Ray Road, #23-271
Phoenix, AZ 85044

1 John C. Burns, MBE# 66462*
2 BURNS LAW FIRM
3 P.O. Box 191250
4 Saint Louis, MO 63119
5 Attorneys for Plaintiffs
6 TPG Communications, LLC and
7 Jordan Conradson
8
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**pro hac vice forthcoming*

Case No. 2:22-cv-01925-JJT

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 28, 2022, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I further certify that a true and correct copy of the foregoing document is being served upon all parties via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Marc J. Randazza

MARC J. RANDAZZA

RANDAZZA | LEGAL GROUP

**U.S. District Court
DISTRICT OF ARIZONA (Phoenix Division)
CIVIL DOCKET FOR CASE #: 2:22-cv-01925-JJT**

TGP Communications LLC et al v. Sellers et al
Assigned to: Judge John J Tuchi
Case in other court: Ninth Circuit, 22-16826
Cause: 42:1983 Civil Rights Act

Date Filed: 11/12/2022
Jury Demand: Plaintiff
Nature of Suit: 440 Civil Rights: Other
Jurisdiction: Federal Question

Plaintiff

TGP Communications LLC
*a Missouri limited liability company
doing business as
Gateway Pundit*

represented by **David Scott Gingras**
Gingras Law Office PLLC
4802 E Ray Rd., Ste. 23-271
Phoenix, AZ 85044
480-668-3623
Fax: 480-248-3196
Email: david@gingraslaw.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Jonathon Christian Burns
Burns Law Firm
P.O. Box 191250
St. Louis, MO 63119
314-329-5040
Email: john@burns-law-firm.com
LEAD ATTORNEY
PRO HAC VICE
ATTORNEY TO BE NOTICED

Marc John Randazza
Randazza Legal Group PLLC
4974 S Rainbow Blvd., Ste. 100
Las Vegas, NV 89117
702-420-2001
Email: marc@randazza.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Plaintiff

Jordan Conradson
an individual

represented by **David Scott Gingras**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Jonathon Christian Burns
(See above for address)
LEAD ATTORNEY
PRO HAC VICE

ATTORNEY TO BE NOTICED

Marc John Randazza

(See above for address)

LEAD ATTORNEY

ATTORNEY TO BE NOTICED

V.

Defendant

Jack Sellers

*in his respective official capacity as member
of the Maricopa County Board of
Supervisors*

represented by **Charles E Trullinger**

Maricopa County Attorney Civil Services
Division

225 W Madison St.

Phoenix, AZ 85003

602-506-8541

Fax: 602-506-8144

Email: trullinc@mcao.maricopa.gov

LEAD ATTORNEY

ATTORNEY TO BE NOTICED

Joseph James Branco

Maricopa County Attorney Civil Services
Division

225 W Madison St.

Phoenix, AZ 85003

602-506-8541

Fax: 602-506-8567

Email: brancoj@mcao.maricopa.gov

LEAD ATTORNEY

ATTORNEY TO BE NOTICED

Joseph Eugene LaRue

Maricopa County Attorneys Office -
Madison St.

225 W Madison St.

Phoenix, AZ 85003

602-506-8541

Fax: 602-506-8567

Email: laruej@mcao.maricopa.gov

LEAD ATTORNEY

ATTORNEY TO BE NOTICED

Thomas P Liddy

Maricopa County Attorneys Office - Civil
Services Division

222 N Central Ave., Ste. 1100

Phoenix, AZ 85004

602-506-8541

Fax: 602-506-8567

Email: liddyt@mcao.maricopa.gov

LEAD ATTORNEY

ATTORNEY TO BE NOTICED

Defendant**Thomas Galvin**

*in his respective official capacity as member
of the Maricopa County Board of
Supervisors*

represented by **Charles E Trullinger**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Joseph James Branco
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Joseph Eugene LaRue
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Thomas P Liddy
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Defendant**Bill Gates**

*in his respective official capacity as member
of the Maricopa County Board of
Supervisors*

represented by **Charles E Trullinger**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Joseph James Branco
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Joseph Eugene LaRue
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Thomas P Liddy
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Defendant**Clint Hickman**

*in his respective official capacity as member
of the Maricopa County Board of
Supervisors*

represented by **Charles E Trullinger**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Joseph James Branco
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Joseph Eugene LaRue
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Thomas P Liddy
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Defendant

Steve Gallardo
*in his respective official capacity as member
of the Maricopa County Board of
Supervisors*

represented by **Charles E Trullinger**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Joseph James Branco
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Joseph Eugene LaRue
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Thomas P Liddy
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Defendant

Stephen Richer
*in his official capacity as the Maricopa
County Recorder*

represented by **Charles E Trullinger**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Joseph James Branco
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Joseph Eugene LaRue
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Thomas P Liddy
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Defendant

Rey Valenzuela

*in his official capacity as Maricopa County
Election Director*

represented by **Charles E Trullinger**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Joseph James Branco

(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Joseph Eugene LaRue

(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Thomas P Liddy

(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Defendant

Scott Jarrett

*in his official capacity as Maricopa County
Election Director*

represented by **Charles E Trullinger**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Joseph James Branco

(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Joseph Eugene LaRue

(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Thomas P Liddy

(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Defendant

Megan Gilbertson

*in her official capacity as Maricopa County
Communications Officer*

represented by **Charles E Trullinger**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Joseph James Branco

(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Joseph Eugene LaRue

(See above for address)

ER0450

*LEAD ATTORNEY
ATTORNEY TO BE NOTICED*

Thomas P Liddy
(See above for address)
*LEAD ATTORNEY
ATTORNEY TO BE NOTICED*

Defendant

Marcus Milam
*in his official capacity as Maricopa County
Communications Officer*

represented by **Charles E Trullinger**
(See above for address)
*LEAD ATTORNEY
ATTORNEY TO BE NOTICED*

Joseph James Branco
(See above for address)
*LEAD ATTORNEY
ATTORNEY TO BE NOTICED*

Joseph Eugene LaRue
(See above for address)
*LEAD ATTORNEY
ATTORNEY TO BE NOTICED*

Thomas P Liddy
(See above for address)
*LEAD ATTORNEY
ATTORNEY TO BE NOTICED*

Date Filed	#	Docket Text
11/12/2022	<u>1</u>	COMPLAINT (TRO Requested). Filing fee received: \$402.00, receipt number AAZDC-21303598 filed by Jordan Conradson, TGP Communications LLC. (Randazza, Marc) (Attachments: # <u>1</u> Civil Cover Sheet, # <u>2</u> Exhibit 1 to Complaint - Press Pass Page, # <u>3</u> Exhibit 2 to Complaint - Press Pass Application, # <u>4</u> Exhibit 3 to Complaint - Registration Form, # <u>5</u> Exhibit 4 to Complaint - Denial and Appeal Email, # <u>6</u> Exhibit 5 to Complaint - Burns Letter)(BAC) (Entered: 11/14/2022)
11/12/2022	<u>2</u>	EX PARTE MOTION for Temporary Restraining Order by Jordan Conradson, TGP Communications LLC. (Randazza, Marc) (Attachments: # <u>1</u> Exhibit 1 to TRO Motion - Denial and Appeal Email, # <u>2</u> Conradson Declaration in Support of TRO Motion, # <u>3</u> Hoft Declaration in Support of TRO Motion, # <u>4</u> Certificate of Service)(BAC) (Entered: 11/14/2022)
11/12/2022	<u>3</u>	Corporate Disclosure Statement by TGP Communications LLC. (Randazza, Marc) (BAC) (Entered: 11/14/2022)
11/12/2022	<u>4</u>	SUMMONS Submitted by Jordan Conradson, TGP Communications LLC. (Randazza, Marc) (Attachments: # <u>1</u> Summons, # <u>2</u> Summons, # <u>3</u> Summons, # <u>4</u> Summons, # <u>5</u> Summons, # <u>6</u> Summons, # <u>7</u> Summons, # <u>8</u> Summons, # <u>9</u> Summons)(BAC) (Entered: 11/14/2022)
11/12/2022	<u>5</u>	Filing fee paid, receipt number AAZDC-21303598. This case has been assigned to the Honorable John J Tuchi. All future pleadings or documents should bear the correct case

ER0451

		number: CV-22-01925-PHX-JJT. Notice of Availability of Magistrate Judge to Exercise Jurisdiction form attached. (BAC) (Entered: 11/14/2022)
11/14/2022	6	Summons Issued as to Steve Gallardo, Thomas Galvin, Bill Gates, Megan Gilbertson, Clint Hickman, Scott Jarrett, Marcus Milam, Stephen Richer, Jack Sellers, Rey Valenzuela. (Attachments: # 1 Summons, # 2 Summons, # 3 Summons, # 4 Summons, # 5 Summons, # 6 Summons, # 7 Summons, # 8 Summons, # 9 Summons)(BAC). *** IMPORTANT: When printing the summons, select "Document and stamps" or "Document and comments" for the seal to appear on the document. (Entered: 11/14/2022)
11/14/2022	7	EX PARTE MOTION for Temporary Restraining Order <i>CORRECTED</i> by Jordan Conradson, TGP Communications LLC. (Attachments: # 1 Exhibit 1 - Denial and Appeal Email, # 2 Attachment Conradson Declaration in Support of Motion, # 3 Attachment Hoft Declaration in Support of Motion, # 4 Attachment Corrected Certificate of Service) (Randazza, Marc) (Entered: 11/14/2022)
11/14/2022	8	Corporate Disclosure Statement by Jordan Conradson, TGP Communications LLC. (Randazza, Marc) (Entered: 11/14/2022)
11/14/2022	9	NOTICE re: Second Certificate of Service by Jordan Conradson, TGP Communications LLC. (Attachments: # 1 Exhibit 1 - Email to Defendants, # 2 Exhibit 2 - Email to MCAO, # 3 Exhibit 3 - Email to MCAO)(Randazza, Marc) (Entered: 11/14/2022)
11/14/2022	10	ORDER: IT IS HEREBY ORDERED that Defendants shall file a Response to Plaintiff's Corrected Emergency Ex Parte Motion for a Temporary Restraining Order (Doc. 7) by no later than 5:00 PM (Arizona time), November 16, 2022. IT IS FURTHER ORDERED setting a hearing on the Motion for a Temporary Restraining Order for Thursday, November 17, 2022, at 10:00 AM (Arizona time) in Courtroom 505, 401 W. Washington Street, Phoenix, AZ 85003 before Judge John J. Tuchi. Each side shall have 60 minutes to present whatever evidence or arguments they wish to present. IT IS FURTHER ORDERED that Counsel for Plaintiffs shall serve a copy of this Order on Defendants forthwith. Signed by Judge John J Tuchi on 11/14/2022. (JAMA) (Entered: 11/14/2022)
11/14/2022	11	NOTICE re: Certificate of Service by Jordan Conradson, TGP Communications LLC re: 10 Order,,, Set/Reset Motion and R&R Deadlines/Hearings,,, Set/Reset Hearings,,, (Attachments: # 1 Exhibit 1 - Email to MCAO)(Randazza, Marc) (Entered: 11/14/2022)
11/15/2022	12	NOTICE re: Filing List of Witnesses by Jordan Conradson, TGP Communications LLC. (Randazza, Marc) (Entered: 11/15/2022)
11/15/2022	13	NOTICE re: Filing Exhibits and Request for Judicial Notice by Jordan Conradson, TGP Communications LLC re: 7 MOTION for Temporary Restraining Order <i>CORRECTED</i> . (Attachments: # 1 Exhibit 1 - The Gateway Pundit Article, # 2 Exhibit 2 - The Gateway Pundit Article, # 3 Exhibit 3 - The Gateway Pundit Article, # 4 Exhibit 4 - The Gateway Pundit Article, # 5 Exhibit 5 - The Gateway Pundit Article, # 6 Exhibit 6 - The Gateway Pundit Article, # 7 Exhibit 7 - The Gateway Pundit Article, # 8 Exhibit 8 - The Gateway Pundit Article, # 9 Exhibit 9 - The Gateway Pundit Article, # 10 Exhibit 10 - The Gateway Pundit Article, # 11 Affidavit of Cassidy S. Curran Authenticating Exhibits)(Randazza, Marc) (Entered: 11/15/2022)
11/16/2022	14	SERVICE EXECUTED filed by Jordan Conradson, TGP Communications LLC: Proof of Service re: Summons, Complaint, Emergency Ex Parte Motion for a Temporary Restraining Order, and Corrected Emergency Ex Parte Motion for a Temporary Restraining Order upon Steve Gallardo, Clint Hickman, Scott Jarrett, Bill Gates, Thomas Galvin, Jack Sellers, and Stephen Richer on 11/14/2022. (Attachments: # 1 Proof of Service - Hickman, # 2 Proof of Service - Jarrett, # 3 Proof of Service - Gates, # 4 Proof of Service - Galvin, #

ER0452

		5 Proof of Service - Sellers, # 6 Proof of Service - Richer)(Randazza, Marc) (Entered: 11/16/2022)
11/16/2022	15	SERVICE EXECUTED filed by Jordan Conradson, TGP Communications LLC: Proof of Service re: Summons, Complaint, Emergency Ex Parte Motion for a Temporary Restraining Order, and Corrected Emergency Ex Parte Motion for a Temporary Restraining Order upon Rey Valenzuela, Megan Gilbertson, and Marcus Milam on 11/15/2022. (Attachments: # 1 Exhibit 1 - Email from MCAO)(Randazza, Marc) (Entered: 11/16/2022)
11/16/2022	16	NOTICE of Appearance by Charles E Trullinger on behalf of Steve Gallardo, Thomas Galvin, Bill Gates, Megan Gilbertson, Clint Hickman, Scott Jarrett, Marcus Milam, Stephen Richer, Jack Sellers, Rey Valenzuela. (Trullinger, Charles) (Entered: 11/16/2022)
11/16/2022	17	RESPONSE to Motion re: 7 MOTION for Temporary Restraining Order <i>CORRECTED [Maricopa County Defendant's Response to Corrected Emergency Exparte Motion for a Temporary Restraining Order]</i> filed by Steve Gallardo, Thomas Galvin, Bill Gates, Megan Gilbertson, Clint Hickman, Scott Jarrett, Marcus Milam, Stephen Richer, Jack Sellers, Rey Valenzuela. (Attachments: # 1 Exhibit Exhibit Index and Exhibits 1-9, # 2 Exhibit Exhibits 10-17, # 3 Exhibit Exhibits 18-20)(Trullinger, Charles) (Entered: 11/16/2022)
11/16/2022	18	AMENDED DOCUMENT by Jordan Conradson, TGP Communications LLC. Amendment to 12 Notice (Other) <i>List of Witnesses</i> . (Randazza, Marc) (Entered: 11/16/2022)
11/16/2022	19	AMENDED DOCUMENT by Jordan Conradson, TGP Communications LLC. Amendment to 18 Amended Document (NOT Motion/Complaint), 12 Notice (Other) <i>List of Witnesses</i> . (Attachments: # 1 Exhibit 1 - Glasser CV, # 2 Exhibit 2 - Glasser Columbia Bio, # 3 Exhibit 3 - Gregg Leslie CV, # 4 Exhibit 4 - Leslie ASU Profile)(Randazza, Marc) (Entered: 11/16/2022)
11/17/2022	20	MINUTE ENTRY for proceedings held before Judge John J Tuchi: Temporary Restraining Order Hearing held on 11/17/2022. Argument held. IT IS ORDERED taking this matter under advisement. Formal order to issue. (See attachment). (Court Reporter Elaine Cropper.) Hearing held 10:03 AM to 12:34 PM.(JAMA) (Entered: 11/17/2022)
11/17/2022	21	Plaintiff/Defendant Witness List.(JAMA) (Entered: 11/17/2022)
11/18/2022	22	TRANSCRIPT REQUEST by Jordan Conradson, TGP Communications LLC for proceedings held on 11/17/2022, Judge John J Tuchi hearing judge(s). (Randazza, Marc) (Entered: 11/18/2022)
11/18/2022	23	NOTICE TO FILER OF DEFICIENCY re: 22 Transcript Request filed by Jordan Conradson, TGP Communications LLC. Document not in compliance with LRCiv 5.5(g) - Documents signed by an attorney shall be filed using that attorney's ECF log-in and password and shall not be filed using a log-in and password belonging to another attorney. Document(s) signed by Jonathon C. Burns but submitted using the log-in and password belonging to Marc Randazza. FOLLOW-UP ACTION REQUIRED: Please refile Transcript Request with name/signature (sections 1 & 19 of the AO435 form) matching the name of the ECF registered user under whose credentials the document will be re-submitted under. Deficiency must be corrected within one business day of this notice. This is a TEXT ENTRY ONLY. There is no PDF document associated with this entry. (RAP) (Entered: 11/18/2022)
11/18/2022	24	AMENDED TRANSCRIPT REQUEST pursuant to 23 Notice of Deficiency by Jordan Conradson, TGP Communications LLC for proceedings held on 11/17/2022, Judge John J Tuchi hearing judge(s). (Randazza, Marc) (Entered: 11/18/2022)
11/18/2022	25	NOTICE re: Filing Exhibit by Jordan Conradson, TGP Communications LLC .

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		(Attachments: # 1 Exhibit 1 - Twitter Post, # 2 Declaration of Trey A. Rothell)(Randazza, Marc) (Entered: 11/18/2022)
11/21/2022	26	ORDER: IT IS HEREBY ORDERED that motions to dismiss pursuant to Fed. R. Civ. P. 12(b) and motions to strike pursuant to Fed. R. Civ. P. 12(f) are discouraged if the defect that would be the subject of the motion can be cured by filing an amended pleading. (See attached Order). Signed by Judge John J Tuchi on 11/21/2022. (JAMA) (Entered: 11/21/2022)
11/23/2022	27	ORDER denying Plaintiffs' Emergency <i>Ex Parte</i> 7 Motion for a Temporary Restraining Order. Signed by Judge John J. Tuchi on 11/23/2022. (ESG) (Entered: 11/23/2022)
11/28/2022	28	NOTICE OF INTERLOCUTORY APPEAL to 9th Circuit Court of Appeals re: 27 Order on Motion for TRO by Jordan Conradson, TGP Communications LLC. Filing fee received: \$ 505.00, receipt number AAZDC-21348287. (Randazza, Marc) (Entered: 11/28/2022)
11/28/2022		Remark: Pro hac vice motion(s) granted for Jonathon Christian Burns on behalf of Plaintiffs Jordan Conradson, TGP Communications LLC. This is a TEXT ENTRY ONLY. There is no PDF document associated with this entry. (BAS) (Entered: 11/28/2022)
11/29/2022	29	USCA Case Number re: 28 Notice of Interlocutory Appeal. Case number 22-16826, Ninth Circuit. (BAC) (Entered: 11/29/2022)

CERTIFICATE OF SERVICE

I hereby certify that on December 8, 2022, I electronically filed the foregoing with the Clerk of the Court for the United States Court of Appeals for the Ninth Circuit by using the appellate CM/ECF system.

Participants in the case who are registered CM/ECF users will be served by the appellate CM/ECF system.

Date: December 8, 2022.

RANDAZZA LEGAL GROUP, PLLC

/s/ Marc J. Randazza

Marc J. Randazza

David S. Gingras

GINGRAS LAW OFFICE, PLLC

Attorneys for Appellants